Member of the public 1422

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. The proposal has been reviewed in light of the Environmental Impact Assessment Report and associated documents, revealing several material deficiencies in 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 and strong cultural identity. Concerns regarding compatibility with statutory requirements and national policy arise from the scale, proximity, and design of the project, challenging the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework used obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, while claims of negligible or non-significant effects lack robust evidence.

There are notable policy conflicts present. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts relate directly to the statutory tests necessary for consent and hinder the competent authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal in this area, featuring large turbines placed near the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives

based on environmental effects, the submission presents a narrative of project evolution. This approach does not demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. Considering the sensitivity of the West Lewis coastline and the significant impact of proximity to shore, the lack of such analysis prevents any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies extend to cable routing and landfall assessment, revealing insufficient 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 failure to establish a clear avoidance strategy and the lack of comparative analysis show 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 reduced through careful site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, obstructing the competent authority from understanding whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be asserted that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot warrant a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant oversight is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are classified as static features, neglecting their continued use and importance as well as the impact that development may have on their surrounding environment. This mischaracterisation leads to an inadequate assessment of cultural effects and overlooks their vital role in community life.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed turbines is fundamentally inadequate, failing to recognise the profound scale of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which are threatened by the introduction of large-scale turbines situated near the shoreline. Such an industrial presence would significantly alter the character of the area, leading to a permanent transformation of the landscape.

Furthermore, the application lacks a thorough representation of the extent of visual change. Given their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, directly compromising visual amenity and undermining the essential qualities of naturalness and remoteness.

This critical impact is not sufficiently conveyed within the assessment, which diminishes the significance of these changes in a sensitive landscape context.

Concerns regarding the methodology used to select and present visual viewpoints also arise, as evidence indicates that certain viewpoints may fail to capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been minimised, thus calling into question the reliability of the assessment.

Moreover, the assessment neglects the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, which obscures their interdependence and leads to an incomplete evaluation of impacts on their setting and cultural value.

The industrialisation of the seascape would sever the critical connections that enable the appreciation of these heritage sites, altering the context in which they are experienced and disrupting their relationship with the natural horizon. This signifies not only a visual impact but also a deeper cultural and spatial detriment that has not been comprehensively evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The magnitude of change proposed is at odds with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further calls into question any assertion of policy compliance.

Lastly, it is evident that the impacts outlined in the proposal cannot be effectively mitigated. Due to the dimensions, height, and closeness of the turbines, their presence would be overpowering and unavoidable, resulting in a fundamental and lasting change that cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately portrays the scale of impact, overlooks the sensitivity of the environment, and fails to recognise the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this significant landscape.

TOURISM

The evaluation of tourism impacts is significantly lacking and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and its sense of remoteness. The application notes that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified assessment of how

large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would offer a net economic benefit or harm an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in comprehending the impacts on a recognised and developing segment of the local economy.

In a community like the island, which has limited economic diversification, the neglect of tourism impact assessments has broader consequences for employment, local businesses, and the sustainability of the community. 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 fails to demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the obligation to show net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and lacks sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and acknowledging the island's economic dependence create a significant evidential gap. This hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a significant failure to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application reiterates the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are substantial gaps in the evidential basis needed for a thorough determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences—raise serious concerns. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a complete understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment constitutes a significant omission. These deficiencies hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

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, in certain areas, inconsistent. The evidential threshold required to discount 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 also lead to considerable and irreversible changes to a landscape of high sensitivity. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative effects on tourism represent enduring consequences that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or employ the appropriate regulatory mechanisms to demand the submission of the missing information.

In light of these concerns, I respectfully request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

It's ridiculous the scale of this project and the size of the turbines, if they were near my house I wouldn't want them so I am supporting those whose house value will be affected by this wind farm being built.

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: ABBA8CA3

Member of the public 1423

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an examination of the Environmental Impact Assessment Report and its associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural relevance, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The design, scale, and proximity of this proposal raise serious questions about its alignment with statutory standards, national policy, and sustainable development principles.

The application is lacking a sufficient evidential foundation necessary for a lawful decision. There are notable omissions of critical environmental data, while the existing baseline information is not only limited but also inconsistent. Key elements of the proposal remain vague and unclarified. The flexibility of the design framework obstructs a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation does not facilitate a comprehensive or informed assessment of the potential impacts on the environment, culture, or community. Assertions of negligible or non-significant effects are unsubstantiated by reliable evidence.

Moreover, there are explicit and serious conflicts with existing policy frameworks. The proposal seems misaligned with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and community health and well-being. It fails to demonstrate compliance with national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly challenge the statutory requirements for consent, undermining the capability of the competent authority to deem the development acceptable within policy parameters.

The scale of this proposal is without precedent in this area, with large turbines situated in very close proximity to the shoreline, which raises significant apprehensions about landscape capacity, visual impact, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and evident policy conflicts illustrate that the application is incomplete and does not support a lawful decision-making process. Under these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and lacks a complete, transparent, and dependable account of the potential environmental effects of the proposed development. The absence of fixed turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope introduces considerable uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, thus undermining the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the actual development, limiting both public understanding and the competent authority's awareness of the true environmental consequences.

Furthermore, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be mitigated at a later stage compromises the ability to conduct a thorough evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is not procedurally acceptable and contradicts the principles of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly defined prior to any determination.

Significant evidential deficiencies are also present, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. This results in uncertainty surrounding the scale and significance of the impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory obligations.

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

In conclusion, the combination of an undefined design envelope, lack of specific 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, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal fails to meet the statutory requirements of the Environmental Impact Assessment regime, as the assessment of alternatives is materially inadequate. Instead of offering a structured comparison of realistic alternatives based on their environmental effects, the application merely presents a narrative account of how the project has evolved. This methodology does not sufficiently demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a clear lack of a transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The West Lewis coastline is sensitive, and proximity to the shore is critical in assessing impact; without this analysis, one cannot conclude that the proposed siting is the least damaging available option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy to avoid these impacts and the absence of comparative analysis suggest that mitigation by design has not been considered, relying instead on post-design measures for mitigation.

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's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is significant and contributes to the overall conclusion that the application has not undergone adequate assessment, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is critically inadequate, failing to provide a comprehensive and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This region is characterised by a delicate and biologically vibrant marine system, yet the baseline data remains insufficient. The methodologies employed do not adequately account for species presence, behaviour, and habitat utilisation. Consequently, the assessment does not offer a solid evidential foundation for assessing impacts.

A significant gap in this evaluation concerns otters, which are a European Protected Species. The application neglects to fully recognise and assess their active utilisation of coastal areas for foraging and movement. By failing to consider their core foraging range and behavioural patterns, the assessment inadequately evaluates the potential effects of construction disturbance, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is prone to underestimating presence, especially when compared to established land-based observations that indicate frequent use of these waters. The lack of integration or proper consideration of such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty concerning the true extent of risks posed to marine species and habitats.

From a regulatory viewpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been correctly identified or assessed. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given 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 hinder a thorough evaluation of impacts on marine ecology and protected species and contribute to the overall determination that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to provide sufficient evidence that internationally important seabird populations, including those associated with protected sites like the Lewis Peatlands and St Kilda, will not be adversely affected. The west coast of the Isle of Lewis is home to many seabird species that are already in decline, yet the assessment does not robustly demonstrate, to the necessary evidential standard, that these species will be safeguarded. The reliance on modelling approaches, particularly for species in severe decline such as Kittiwakes and Fulmars, introduces uncertainty. The methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and the behavioural responses of these birds are not fully understood.

Significantly, the siting of turbines within a recognised migratory corridor poses an additional risk by creating a barrier within 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 in this corridor, nor does it consider the potential effects on species with relatively small global populations. The shortcomings in the assessment raise serious concerns about the reliability of the conclusions drawn.

A fundamental contradiction within the application sees the developer asserting that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency undermines the validity of the assessment and indicates that the conclusions presented do not align with the evidence that supports them.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, hindering a lawful conclusion in favour of consent.

Moreover, the identified deficiencies illustrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. Taken as a whole, the assessment is unreliable, marred by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These flaws preclude a thorough evaluation of the impacts, reinforcing the conclusion that the application does not satisfy the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It overlooks this area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of isolated and unchanging assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the inadequate treatment of 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 mischaracterised as static features. The assessment fails to consider their continued use and meaning, along with the potential impact of development on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the application does not take into account intangible cultural heritage, which includes the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity and are glaringly absent from the assessment, representing a significant shortcoming. The cultural impacts of the development cannot be adequately understood without these considerations.

There are additional concerns related to community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as that of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been observed. The lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

A crucial procedural failure is the omission of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thus preventing a lawful determination.

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

Collectively, the neglect to assess living heritage, intangible cultural value, community rights, and legal obligations results in a substantial evidential gap. The cultural impacts of the proposed development have not been properly evaluated, and the application fails to provide a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a valid evaluation. Although the developer has commissioned a Social Impact Assessment, which included engaging with local residents through focus groups, the absence of the full report creates a significant evidential gap. This gap hampers both public understanding and the competent authority’s ability to grasp the comprehensive social risks identified in the developer’s own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement rather than speculation. However, the withholding of the complete assessment stifles thorough scrutiny of the findings and restricts the capacity to evaluate their importance in the decision-making process.

Additionally, there is notable evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nevertheless, these adverse impacts have not been sufficiently incorporated into the main application or accorded the necessary weight. The lack of access to the full Social Impact Assessment effectively obscures the real human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A full understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning could be at stake. The failure to provide the complete dataset means the application does not offer a thorough evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the available evidence highlights existing adverse effects that remain undisclosed. Without the full assessment, it cannot be established that the application adheres to this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a sound socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the application and signifies a failure to meet the evidential standards mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, together with the documented existing adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is lacking and does not adequately reflect the significant changes that would occur or the sensitivity of the environment involved. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering the area's character and causing a permanent and irreversible transformation of the landscape.

The application does not fully represent the extent of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This situation would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the level of impact or its significance

concerning this sensitive landscape.

Methodological concerns also arise from the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This could mean that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Another critical deficiency is the failure to examine the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and altering their relationship with the natural horizon. This change represents not just a visual impact but also broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change does not align with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any claims of policy compliance.

Furthermore, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, making them unable to be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are essential for evaluating potential environmental effects. It entails extensive seabed preparation and installation activities within a high-energy Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead proposes to rely on mitigation and contingency measures that would be formulated after consent, which hinders any substantial assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is alarming, particularly in light of the

sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer adequate detail on methods for prevention, control, or monitoring of these risks.

Moreover, there remains uncertainty regarding the scale and dynamics of sediment plumes generated from seabed disturbance and cable installation. In the absence of rigorous modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to possible effects on marine species and habitats already identified as sensitive within the broader assessment.

The lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are available to address pollution incidents. This situation not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to granting consent, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts renders the assessment materially inadequate. These inadequacies obstruct a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the

local fishing fleet. As a result, without an evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended timeframe is likely to disturb species over large distances, notably impacting the local bottlenose dolphin population. Concerns regarding the predicted disturbance to a significant proportion of these dolphins are serious, yet the application appears to downplay these effects without providing adequate supporting evidence.

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

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly inadequate and does not take into account the full range of impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are inherently linked; however, they are evaluated separately. This results in a disjointed approach that conceals the actual magnitude of the environmental and socio-economic consequences.

Included in the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure traversing sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically

delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered collectively; nevertheless, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not indicate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which brings into question the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are important for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This would significantly change the night-time environment.

The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Dark skies are crucial to the area’s identity and to emerging sectors like astro-tourism. This oversight leads to a

notable gap in the landscape and environmental assessment.

Moreover, the application does not evaluate the effects of artificial lighting on nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to such lighting, which can cause disorientation and increase collision risks. There is no lighting impact assessment or phototaxis study included, which means the potential effects on these species and their mortality rates are not addressed.

The situation is worsened by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has also not been assessed. The lack of specific night-time data leads to a significant understanding gap regarding ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4, which aims to protect natural places and ensure environmental quality. It also weakens the overall evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

TOURISM

The 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 demonstrates significant deficiencies in meeting the standards required for sustainable development as outlined by statutory duties, national policy, and evidential criteria. This application revisits the fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, highlighting an unacceptable scale of industrialisation. Notably, it is now presented within a regulatory framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are critical shortcomings in the evidential basis for the application, including substantial gaps in baseline data. The use of an undefined design envelope, dependence on unspecified mitigation measures, and failure to address key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects further contribute to an incomplete Environmental Impact Assessment. This inadequacy hampers the understanding of potential significant effects and residual impacts.

Procedural shortcomings are evident, notably in the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment represents a significant gap, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failings collectively render the application unsuitable for

determination.

Conflicts with National Planning Framework 4 are apparent, as the proposal does not adequately protect biodiversity, natural environments, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore activities has not been thoroughly conducted, leaving effects on peatlands, carbon balance, habitats, and crofting land inadequately addressed.

Uncertainties regarding environmental risks persist. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The necessary evidential standard to conclusively rule out adverse effects has not been fulfilled, which invokes the precautionary principle and precludes a lawful finding that impacts are acceptable.

The proposal will induce significant and irreversible alterations to a highly sensitive landscape. Industrialisation along the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and adverse effects on tourism are all permanent consequences that cannot be satisfactorily mitigated.

In summary, this application is fundamentally flawed both procedurally and substantively. The extent of the informational deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful, evidence-based decision-making process. It is imperative that the competent authority either refuse consent based on these grounds or utilise the relevant regulatory measures to mandate the submission of the necessary information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C4CBBAEA

Member of the public 1424

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 a detailed examination of the Environmental Impact Assessment Report and associated documents, pinpointing critical deficiencies across planning, environmental, cultural, and procedural dimensions. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely untouched environment, and rich cultural heritage. Concerns are raised about the scale, proximity, and design of the proposed development, which challenge its alignment with statutory obligations, national policy directives, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful assessment. It omits crucial environmental data, presents limited and inconsistent baseline information, and leaves significant components of the proposal undefined. The implementation of a flexible design framework obscures the assessment of likely significant effects, and the dependence on unarticulated mitigation measures hampers any evaluation of their potential effectiveness. Consequently, the information provided fails to facilitate a comprehensive understanding of the environmental, cultural, or community repercussions, and assertions of negligible or insignificant impacts lack robust supporting evidence.

Furthermore, clear and considerable policy discrepancies have emerged. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national standards for biodiversity protection, climate considerations, and environmental integrity. These inconsistencies relate directly to the statutory tests necessary for consent and jeopardise the ability of the relevant authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of this proposal raises additional concerns, as large turbines are set to be positioned in close proximity to the shoreline, provoking substantial issues regarding landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, weaknesses in evidence, and evident non-compliance with policy guidelines indicate that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, it is imperative that the precautionary principle be enforced.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and lacks a complete, transparent, and dependable account of the potential environmental effects of the proposed development. The absence of fixed turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope introduces considerable uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, thus undermining the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the actual development, limiting both public understanding and the competent authority's awareness of the true environmental consequences.

Furthermore, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be mitigated at a later stage compromises the ability to conduct a thorough evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is not procedurally acceptable and contradicts the principles of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly defined prior to any determination.

Significant evidential deficiencies are also present, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. This results in uncertainty surrounding the scale and significance of the impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory obligations.

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

In conclusion, the combination of an undefined design envelope, lack of specific 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, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives presented in the application is insufficient and does not fulfil the requirements of the Environmental Impact Assessment. Instead of offering a

structured and reasoned comparison of viable alternatives based on environmental impacts, the application merely recounts the project's development history. This method does not establish that less harmful options have been effectively identified, evaluated, and chosen over more damaging alternatives.

There is a lack of transparent and evidence-based comparisons of different offshore locations, development sizes, or design configurations. Notably, the application fails to show that the developer has adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would probably be less severe. The sensitive nature of the West Lewis coastline and the critical significance of proximity to the shore in assessing impact highlight the failure to analyse these options, preventing any conclusion that the proposed site is the least damaging one.

This inadequacy also affects cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to determine if there are less harmful and more suitable alternatives available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is sustainable or complies with relevant policies.

From a policy standpoint, this shortcoming compromises adherence to 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 oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot receive a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, revealing significant evidence gaps and internal contradictions that compromise its conclusions. Located within key foraging areas and migratory pathways, the site on the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application fails to provide the necessary evidential standard to ensure that these species will not suffer adverse effects.

A critical inconsistency arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction undermines the assessment's reliability and suggests that the presented conclusions lack adequate support from the evidence.

Furthermore, the assessment does not convincingly 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 addressed, and the reliance on modelling introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and the behavioural responses of birds are not fully understood.

The siting of turbines within a recognised migratory corridor adds a further substantial risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately evaluates the long-term consequences of ongoing mortality within this corridor or the potential impacts on species that have relatively small global populations.

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

Collectively, these identified deficiencies signify non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely affected puts the proposal in direct opposition to national policy.

In summary, the assessment's reliability is compromised by internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of the potential impacts and culminate in the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely lacking. It does not recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. Instead, the application simplifies heritage by viewing it as a collection of isolated and static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

One significant issue is the handling of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet they are treated as unchanging features in the assessment. This approach neglects their continued use and significance, as well as the effects of development on their surroundings. Such misrepresentation leads to an incomplete understanding of cultural impacts and fails to acknowledge their importance to

community life.

Moreover, the assessment does not address intangible aspects of cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but have been entirely omitted from the evaluation, creating a major gap. Without these considerations, the cultural impact of the development remains inadequately understood.

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

A significant procedural flaw is the failure to carry out a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This omission alone hinders a lawful determination.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, diverges from policy requirements.

Overall, the inadequate assessment of living heritage, intangible cultural values, community rights, and statutory obligations leads to a considerable evidential gap. The cultural effects of the development have not been thoroughly evaluated, and the application fails to provide a solid foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and significantly undermines the evaluation of social impacts, health, and wellbeing associated with this development. Although the developer conducted focus groups with local residents, the full report has not been made available. This gap in evidence hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own work.

Residents are already reporting measurable stress, anxiety, and concern related to the scale and proximity of the proposal, and these impacts arise from direct engagement rather than speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly or to appreciate their significance in the decision-making process.

Moreover, there is an evident perception that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of "cultural loss." Despite this, these critical impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

This situation adversely affects the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly in terms of their effects on community character and functioning. The lack of the complete dataset undermines the application, preventing a thorough assessment of the balance between potential benefits and harms.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing, which stipulates that developments should promote positive health outcomes while avoiding harm. The available evidence suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy without the complete assessment.

Procedurally, the implications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a serious flaw within the application and indicates a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing negative impacts, results in an incomplete and unreliable assessment. This scenario not only obstructs a lawful determination but also reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is alarmingly inadequate and does not truly capture the extent of change or the sensitivity of the environment that would be affected. The West Lewis coastline is characterised by its expansive Atlantic horizon, its unspoilt nature, and its profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to portray the scale of this visual disruption accurately. The turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment neglects to adequately express the

significance of this impact within such a vulnerable landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This oversight risks understating the visual impact's magnitude and calls into question the reliability of the assessment.

Another serious shortcoming is the failure to consider the interconnected nature of the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these as separate assets rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural relevance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and breaking their connection to the natural horizon. This impact transcends mere visual disruption, representing a significant cultural and spatial harm that the application does not adequately address.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which relates to the protection of natural environments and historic sites. The scale of proposed change is fundamentally at odds with the necessity to preserve landscape character, visual amenity, and the contexts of culturally important locations. Furthermore, the absence of a thorough worst-case assessment raises serious doubts about compliance with policy requirements.

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

In summary, the assessment fails to represent the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. These significant deficiencies preclude a reliable evaluation and reinforce the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to its incomplete assessment of construction and pollution risks, which lacks the necessary detail to understand the potential environmental impacts. It involves extensive seabed preparation and installation activities within a challenging Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application suggests relying on mitigation and contingency

measures that are to be formulated after consent, which makes it impossible to evaluate their sufficiency or effectiveness.

This approach is particularly alarming considering the vulnerability of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge certain risks, including sediment mobilisation and possible chemical or oil spills, it fails to outline adequate strategies to prevent, control, or monitor these issues.

There is further ambiguity about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it is impossible to gauge the extent, duration, or ecological implications of these impacts. This uncertainty extends to the potential effects on already sensitive marine species and habitats highlighted in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing the planning for contingencies until after consent is granted, the application compromises the ability to evaluate whether proper safeguards are established to handle pollution incidents. This introduces procedural risks and weakens the capacity of the competent authority to make informed decisions regarding environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be appraised before consent can be granted, and the absence of this information means a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy standards concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts significantly undermines the assessment's validity. These deficiencies prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The assessment of the application is lacking in its evaluation of fisheries and marine life, failing to adequately address the ecological and socio-economic impacts. The fishing industry is active in the waters off the West Lewis coast, which also supports a diverse marine ecosystem. However, the application does not provide evidence that these habitats and activities can be protected or maintained without significant disruption.

A key concern is the assumption that fishing can be displaced without adverse effects. There is no evidence presented to show that alternative fishing grounds exist or can

support the increased pressure from displaced activities. This significant omission raises the risk of overfishing in other areas, which could have wider economic implications for the local fishing fleet. Without a clear and evidence-based analysis, the potential impacts on fisheries and local livelihoods remain unclear.

The proposal also poses serious risks to marine species, particularly due to underwater noise from construction activities. High-energy hammer piling over prolonged periods is likely to disturb marine life over large distances, including species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimises these impacts and lacks sufficient supporting evidence.

There is an inconsistency within the application regarding the need for licences for any harm to European Protected Species. While acknowledging this necessity, the application also describes the impacts as negligible, which undermines the assessment's credibility. This contradiction raises compliance issues with the Habitats Regulations, especially when potential harm that requires legal authorisation is anticipated.

Cumulative impacts from habitat disturbance, noise, and fishing displacement have not been adequately considered in the assessment. Without an in-depth evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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, hindering any determination of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is insufficient and fails to encompass the full range of impacts from a project that should be considered as a cohesive whole. The offshore turbines and the onshore works are inherently connected, yet their evaluation occurs separately, leading to a disjointed analysis that masks the true extent of environmental and socio-economic consequences.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, obstructing a

comprehensive understanding of the project's environmental footprint.

By failing to address the onshore impacts adequately, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements are assessed collectively; however, the disjunction between offshore and onshore evaluations leaves the combined repercussions on peatlands, habitats, and local communities inadequately explored.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application does not sufficiently show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application fails to provide evidence that the requisite consents or processes have been initiated, bringing into question the deliverability and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a unified entity, alongside insufficient demonstration of protection for peatlands, habitats, and land use interests, is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The Environmental Impact Assessment fails to address the effects of proposed permanent red aviation lighting that would be visible over long distances. This lighting would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There is no analysis of how this lighting would affect visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is significant given the vital role that dark skies play in the region's identity and in emerging tourism sectors like astro-tourism. The failure to consider these impacts highlights a clear gap in the overall landscape and environmental assessment.

More critically, the proposal does not evaluate the 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 their phototactic responses, which

can lead to disorientation and a heightened risk of collision. The application lacks a lighting impact assessment or phototaxis study, thus failing to examine the potential effects of aviation lighting on these species or the possibility of increased mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or the risks associated with it. Other species, such as Kittiwakes, which may forage or migrate at night, also face disorientation risks due to artificial lighting, yet this has not been evaluated. Without site-specific night-time data, a critical gap in understanding ecological impacts remains.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, which necessitates the application of the precautionary principle and precludes a lawful determination.

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

In summary, the lack of any assessment of 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 unsuitable for 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 proposal for the Spiorad na Mara Offshore Wind Farm exhibits significant shortcomings that undermine its compliance with the principles of sustainable development as mandated by statutory duties and national policy. The application mirrors the primary concerns that led to 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 the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing, it fails to address these critical issues adequately.

A reliable evidential basis for determination is absent from the application. It contains notable gaps in baseline data and utilises an undefined design envelope, while also depending on unspecified mitigation measures. Furthermore, it overlooks essential impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment remains incomplete, preventing an accurate understanding of potential significant effects and residual impacts.

Procedural inadequacies are evident as well. The failure to conduct a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal stands in opposition to National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It also fails to confirm 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 effects of both offshore and onshore components have not been thoroughly evaluated, thus obscuring the impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and could be significantly detrimental. The assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidence required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle, thereby preventing a lawful determination that the impacts are acceptable.

Moreover, the proposal would bring about substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative effects on tourism signify enduring consequences that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for consideration. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, hinder any lawful, evidence-based decision-making process. Therefore, the competent authority must refuse consent on these grounds or invoke the necessary regulatory provisions to obtain the required 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

I just left the island to live away after getting married last year, having lived there all my life. The building of these turbines so closely to the land, and on such a huge scale, is heartbreaking. Not least, the serious health risks which as yet are somewhat unknown to living so close to such huge turbines, so that the people in the close vicinity are being treated liked guinea pigs, and it is not even to benefit the local people.
Our unspoilt scenery, which is becoming few and far between in other places, will be immediately ruined and tourism will definitely take a huge hit as a result. Considering this is the islands greatest source of income this is very serious and it must not be allowed to go ahead.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3E5BCCBC

Member of the public 1425

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the proposal's scale, proximity, and design call into question its compliance with statutory requirements, national policy, and sustainable development principles.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, limited and inconsistent baseline information, and essential aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of potentially significant effects, and the unspecified nature of mitigation measures raises questions about their effectiveness. Consequently, the documentation fails to offer a complete and informed perspective on environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantive conflicts with policy are evident. The proposal seems 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 to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal’s acceptability in policy terms.

The unprecedented scale of the proposal raises alarm, with large turbines planned close to the shoreline, creating significant issues around landscape capacity, visual dominance, and environmental impact. In light of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and unable to support a lawful determination. In this context, the precautionary principle must be 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 inadequacy of the assessment of alternatives raises serious concerns regarding compliance with the statutory requirements of the Environmental Impact Assessment regime. The application fails to provide a coherent and reasoned comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative detailing the evolution of the project, which does not convincingly illustrate that less harmful options have been sufficiently identified, assessed, and selected over more damaging alternatives.

Moreover, there is a notable lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not adequately demonstrate that the developer has considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be mitigated. The sensitivity of the West Lewis coastline, alongside the critical significance of proximity to shore in assessing impact, necessitates such analysis. The absence of this examination inhibits any determination that the proposed siting represents the least damaging option.

The shortcomings also affect the assessment of cable routing and landfall, revealing inadequate evidence that alternative routes have been thoroughly explored to minimise impacts on sensitive receptors, which include culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy, coupled with insufficient comparative analysis, suggests that there has been no application of mitigation by design, thus relying predominantly on post-design mitigation measures.

Consequently, the application does not successfully demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This oversight constitutes a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be definitively stated that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency significantly undermines alignment with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission, further contributing to the overarching conclusion that the application has not undergone adequate evaluation and thus cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This area is known for its sensitivity and biological activity. However, the baseline data provided is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to establish a reliable evidential basis for evaluating potential impacts.

A notable gap in the assessment concerns otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of the potential impacts from construction activities, noise, and increased human presence. Such inadequacies undermine the conclusions drawn about the absence of significant effects on this

species.

Further shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces a considerable detection bias, particularly in the Atlantic's unique conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that reveal frequent usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline, which in turn undermines the reliability of the conclusions.

These methodological issues mean that any conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful evaluations of cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This uncertainty raises concerns regarding the true extent of risks 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. The degree of uncertainty introduced impedes the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings regarding the protection of biodiversity, failing to meet the evidential standards necessary to ascertain that no adverse effects will occur to protected sites. The presence of contradictions within the application undermines the assessment's reliability. Notably, while the developer asserts that no significant adverse effects will arise, this claim is juxtaposed with the advancement of a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. Such inconsistencies raise serious concerns about the validity of the conclusions drawn, indicating a lack of robust support from the underlying evidence.

The application overlooks the critical importance of key foraging areas and migratory pathways for seabird populations on the west coast of the Isle of Lewis, which are internationally recognised and currently face declining numbers. The assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss, particularly concerning seabirds tied to protected sites like the Lewis Peatlands

and St Kilda. The reliance on modelling approaches raises uncertainties, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. Additionally, the methodologies employed likely underestimate potential mortality rates, as they do not fully account for incomplete baseline data or the complexities of behavioural responses.

The siting of turbines within a recognised migratory corridor poses a further significant risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, as well as the potential impact on species with small global populations, have not been sufficiently addressed in the application.

From a regulatory standpoint, the evidence presented does not satisfy the necessary threshold to determine that protected sites' integrity will remain unaffected. The assessment's contradictory conclusions, along with data gaps and methodological limitations, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby preventing a lawful conclusion that would support the granting of consent.

In summary, the ornithological assessment suffers from serious internal inconsistencies, methodological flaws, and a lack of substantial evidence, rendering it unreliable. Collectively, these deficiencies hinder an accurate evaluation of the impacts and indicate that the application does not fulfil the statutory requirements essential for determination, thereby conflicting with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application fails to conduct a thorough assessment of the intangible cultural heritage that includes the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are fundamental to the identity of the area and their exclusion from the assessment signifies a serious oversight. Without addressing these aspects, the true cultural impact of the proposed development remains obscured.

A significant shortcoming of the assessment is its inadequate 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 merely classified as static features in the evaluation. This oversight neglects their ongoing significance and the influence of the proposed development on their surroundings, leading to an incomplete understanding of cultural effects within the community.

Moreover, there are pressing concerns surrounding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity associated with Indigenous Peoples, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the

assessment and disregards established principles concerning participation in matters that affect cultural and environmental interests.

The assessment is also deficient in its failure to include a compliant Island Communities Impact Assessment, a requirement stipulated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This oversight is critical as it hinders a lawful determination of the proposal.

From a policy standpoint, the deficiencies highlighted in the assessment place the proposal at odds with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as the acknowledgment of living cultural practices, indicates a clear deviation from policy mandates.

In summary, the cumulative failures to assess living heritage, intangible cultural values, community rights, and statutory requirements culminate in a considerable evidential gap. The cultural impacts of the development have not been adequately explored, and the application ultimately lacks a robust foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a complete assessment of social impacts, health, and wellbeing. The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This omission creates a significant gap in evidence and hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer’s research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement with the community and are not speculative. Nonetheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, these effects have not been adequately incorporated into the main application, nor have they been given appropriate weight. The withholding of 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. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning may be affected. By not providing the complete dataset, the application

fails to offer a robust evidential basis to evaluate the balance between benefits and harms.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the available evidence points to existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be established.

The procedural implications are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes 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, paired with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the conclusion that the application does not possess sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal lacks a thorough assessment of the seascape, landscape, and visual impacts, failing to adequately represent the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is marked by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a continuous industrial presence that fundamentally alters this character, leading to a permanent transformation of the landscape.

There are serious concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests a risk of underestimating the magnitude of visual impact, which raises doubts about the reliability of the assessment.

The application fails to consider 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 setting intertwined with the Atlantic horizon. Treating these heritage assets as isolated, rather than recognising their interdependence, results in an inadequate evaluation of impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would sever these vital relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This poses not only a visual impact but also a

broader cultural and spatial harm that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4's commitment to safeguarding natural places and historic assets. The scale of the proposed changes is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, unable to be reduced to an acceptable level through any form of mitigation.

Overall, the assessment is inadequate, failing to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are crucial for evaluating potential environmental effects. It involves extensive seabed preparation and installation work in a high-energy Atlantic environment, yet fails to provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures to be formulated after consent is granted, hindering any thorough assessment of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises substantial concerns, particularly given the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on strategies for prevention, control, or monitoring of these issues.

There is also significant uncertainty surrounding the scale and behaviour of sediment plumes that could result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

Furthermore, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are in

place to manage pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be evaluated before consent can be granted, and without this crucial information, a lawful determination cannot be reached. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of well-defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These issues impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding marine species and habitats along the West Lewis coast, a region that not only boasts a diverse marine ecosystem but also supports an active fishing industry. The assessment provided is inadequate, lacking a robust evaluation of both ecological and socio-economic impacts. It neglects to demonstrate how these vital uses and habitats can be protected without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be displaced without repercussions. There is no evidence presented to suggest that alternative fishing grounds are available or can sustain the additional pressure resulting from this displacement. This oversight is particularly alarming, as it risks leading to overfishing in different areas and could have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain obscured.

In addition, the proposal introduces considerable risks to marine life, notably through the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb marine species across considerable distances, including the local bottlenose dolphin population. The anticipated disturbance to a significant portion of these dolphins raises profound concerns, yet the application appears to minimise the severity of these effects, lacking adequate supporting evidence.

Furthermore, there is an evident inconsistency in the application. While it acknowledges the necessity for licenses to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about its compliance with the Habitats Regulations, particularly where anticipated harm

requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with current marine users or avoid adverse effects on marine biodiversity. This lack of clarity prevents the determination of whether the proposal represents sustainable development.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings ultimately hinder a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such activities include excavation in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

Additionally, by deferring or omitting the assessment of onshore impacts, the application undermines the capacity to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all project components be considered in conjunction, yet the current approach leads to a lack of understanding of the combined effects on peatlands, habitats, and local communities. The risks posed to sensitive habitats such as machair systems and peatland environments, which are protected by policy, remain unaddressed in the application. It does not convincingly demonstrate that thorough assessments of these habitats have been conducted or that suitable avoidance measures have been considered, revealing a significant evidential gap regarding biodiversity protection.

There are also serious concerns about carbon balance stemming from this proposal. The disturbance of peatland can release carbon that has been stored, potentially incurring a carbon debt that contradicts the fundamental goals of renewable energy

initiatives. The application falls short in addressing this critical issue, failing to show that the overall carbon balance is indeed favourable.

Moreover, the routing of infrastructure through active croft land raises conflicts with existing land use and legal rights. The application provides insufficient evidence that requisite consents or processes have been initiated, which casts doubt on the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to ensure the protection of peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated significantly undermines the application. Overall, the disjointed treatment of project components, the absence of a comprehensive evaluation, and the insufficient evidence regarding environmental and land use impacts result in an application that is incomplete and unreliable, thus impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies constitutes a serious gap in the Environmental Impact Assessment. The proposal is situated along the West Lewis coastline, an area known for its exceptionally dark skies that are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will create a continuous “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Significantly, the application does not evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly noteworthy given that dark skies are vital to the area's identity and to emerging sectors such as astro-tourism. As a result, the failure to consider these impacts leads to a clear shortfall in the overall landscape and environmental evaluation.

Moreover, there is no examination of how the lighting may affect nocturnal wildlife, including sensitive species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel. These species are particularly vulnerable to artificial lighting due to their phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, meaning it does not assess the potential effects of aviation lighting on these species or their mortality rates.

This gap is further exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and related risks. Species such as Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial light, yet this has not been evaluated. The absence of night-time specific data leads to a critical shortfall in understanding ecological consequences.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, the omissions in the assessment contravene the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. This also detracts from the comprehensive evaluation of landscape and seascape impacts, since the character of night-time environments is an essential aspect of the overall setting.

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

TOURISM

The assessment of the tourism impacts is inadequate and does not evaluate the economic and social consequences for an important sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model the impact of industrialisation on the seascape and the loss of environmental quality on Tourism Gross Value Added or overall economic resilience. This lack of analysis means it is impossible to determine whether the development would provide a net economic benefit or harm a vital and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, leaving a major gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the neglect of tourism impact assessments poses broader implications for employment, local businesses, and community sustainability. The failure to conduct a proper Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as

required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the need to show net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development when evaluated against statutory duties and national policy. The application revisits the critical issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. This new submission is made under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the baseline data provided, and the proposal employs an undefined design envelope while depending on unspecified mitigation measures. It neglects to address key impact pathways, including effects on nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment remains incomplete, lacking the necessary information to fully understand likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose the entire Social Impact Assessment is a notable omission. These flaws hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

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

The uncertainties surrounding environmental risks are significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are

incomplete and contain inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I object to the wind farm development for the reasons stated above and the huge impact on the natural precious environment here in the Outer Hebrides.

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: 067AB0B2

Member of the public 1426

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and completeness. A flexible Project Design Envelope is employed, lacking firm commitments to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to consistently apply a worst-case scenario, which is essential for a credible assessment. Consequently, the impacts detailed may not accurately represent those of the development that would eventually be constructed, limiting both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

Moreover, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these circumstances defers critical information to stages post-consent, making it impossible to evaluate the effectiveness of these measures or assess residual impacts meaningfully. This procedural approach is unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and appropriate mitigations are clarified before any determination can be made.

Evidential shortcomings also permeate the assessment, with notable 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, particularly where claims of negligible or non-significant effects lack robust supporting data. Insufficient information precludes a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As such, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively assessed or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects and leave the competent authority without the necessary information to make a well-informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives based on environmental impacts, it merely recounts the project's development. This method

does not sufficiently prove that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is no clear or transparent comparison of potential offshore locations, scales of development, or design configurations. Notably, the proposal fails to show that the developer has adequately considered placing turbines further offshore, where there would likely be reduced visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical nature of proximity to the shore in evaluating impact, highlights the necessity of such analysis. The lack of this examination means there is no assurance that the proposed siting is indeed the least damaging alternative.

The issues extend to cable routing and landfall assessments, revealing a lack of 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 absence of a clear strategy for avoidance and the lack of comparative analysis suggest that the application has not incorporated mitigation by design, instead relying on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which hampers the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives. In the absence of a thorough alternatives assessment, it cannot be determined that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not undergone adequate evaluation and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is lacking and fails to offer a thorough understanding of ecological receptors in the West Lewis coastal environment. This region is known for its biological activity and sensitivity, yet the baseline data presented is incomplete, and the methodologies used do not effectively capture the presence, behaviour, or habitat utilisation of various species. Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

An important oversight in this assessment pertains to otters, a species protected under European law. The application does not adequately acknowledge or evaluate their active utilisation of coastal areas for foraging and movement. The failure to consider their primary foraging ranges and behavioural patterns leads to an insufficient assessment of how construction-related disturbances, noise, and increased activity

may affect them. This oversight raises questions about the validity of any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks. The heavy reliance on aerial surveys introduces a significant detection bias, especially in the challenging conditions often found in the Atlantic. This methodology likely underrepresents the actual presence of these sharks, in contrast to established land-based observations that indicate their frequent presence in these waters. By neglecting to include or adequately consider such data, the assessment presents an incomplete baseline and diminishes the credibility of its findings.

The methodological flaws mean that the conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. Without adequate baseline data, it is not possible to carry out a meaningful assessment of cumulative and indirect impacts, such as seasonal variations or broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not comply with the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been performed properly. The resulting uncertainty makes it impossible to rule out adverse effects with reasonable scientific confidence, necessitating the application of the precautionary principle. In light of these issues, granting consent is not legally justifiable.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment unreliable. These flaws hinder a comprehensive evaluation of the impacts on marine ecology and protected species and underscore that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site on the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately demonstrate that these species will remain unaffected by the proposed development. Key foraging areas and migratory pathways are located within the project area, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A major inconsistency arises within the application, as the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation. This derogation is typically needed only when significant harm is anticipated, thus casting doubt on the reliability of the assessment and suggesting that its conclusions lack supporting evidence. Furthermore, the assessment does not convincingly show

that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unharmed. The importance of these feeding grounds has not been fully addressed, and the use of modelling approaches introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines in a recognised migratory corridor poses an additional risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term impacts of increased mortality in this corridor or consider the effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential threshold to assert no adverse effects 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 met. This invokes the precautionary principle and undermines any lawful conclusion in favour of consent.

Additionally, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static features, disregarding their continued use and the ramifications of development on their surroundings. This mischaracterisation leads to a flawed evaluation of cultural effects and ignores their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal in question raises substantial concerns regarding its social impacts, health, and wellbeing. The developer has undertaken a Social Impact Assessment, which included engaging with local residents through focus groups. However, the full report remains unpublished, creating a critical evidential gap that hinders the public and relevant authorities from grasping the complete range of social risks highlighted by the developer’s own research.

Residents have reported experiencing significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct interactions and are therefore not based on speculation. Nevertheless, the lack of transparency in disclosing the comprehensive assessment restricts thorough examination of these findings, limiting the ability to assess their relevance in the decision-making process.

Furthermore, the proposal appears to pose a direct threat to the community’s 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 afforded the necessary consideration. The failure to publish the full Social Impact Assessment thus obscures the true human and social costs linked to the development.

This deficiency in transparency compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health impacts is crucial, especially when community character and functioning are at stake. By not providing the complete dataset, the application lacks a comprehensive evidential foundation needed to weigh 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 projects should promote positive health outcomes and mitigate harm; however, existing evidence indicates adverse effects that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy becomes impossible.

The procedural ramifications are considerable. The competent authority is unable to conduct a rigorous socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and fails to satisfy the evidential standards set forth in the Environmental Impact Assessment framework.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints selected may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning

key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact is understated, thereby undermining the reliability of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

incidents will be prevented, managed, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application under consideration lacks a robust evaluation of the ecological and socio-economic impacts associated with the proposed development. It does not adequately demonstrate that these vital habitats and activities can be preserved without significant disruption.

A significant concern arises from the assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure from displaced fishing efforts. This is a critical oversight, as such displacement could lead to overfishing in other areas, potentially resulting in severe economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise from construction activities. The use of high-energy hammer piling

over an extended timeframe is anticipated to disturb marine life over large distances, with particular concern for species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises alarming questions, yet the application tends to minimise the importance of these effects, lacking sufficient supporting evidence.

The application also presents an inconsistency regarding the necessity for licences to permit harm to European Protected Species, acknowledging the need while simultaneously describing the impacts as negligible. This contradiction raises doubts about the credibility of the assessment and brings to light serious compliance issues with the Habitats Regulations, especially when harm is expected to necessitate legal authorisation.

Furthermore, the assessment overlooks the cumulative impacts of various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application fails to align with the principles outlined in National Planning Framework 4 and the National Marine Plan. It does not adequately demonstrate that the development can coexist with current marine users or avoid unacceptable consequences for marine biodiversity. This prevents any conclusion that the proposal is a model of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is significantly incomplete and does not consider the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are closely connected, yet their assessment occurs in isolation. This leads to a fragmented approach, masking the true extent of both environmental and socio-economic consequences.

The onshore components encompass cabling that runs across protected moorland, the construction of a substation located near Stornoway, and the required access infrastructure through sensitive landscapes. These activities involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which obstructs a complete understanding of the overall environmental footprint of the project.

By omitting or postponing the assessment of onshore impacts, the application

precludes a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project are reviewed collectively; however, the disjointed assessment of offshore and onshore components leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application fails to show that impacts on these vital habitats have been fully evaluated or that suitable avoidance measures have been implemented. This reveals a substantial evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or processes have been initiated, which raises concerns about the feasibility and legality of the proposed implementation.

From a policy standpoint, the failure to consider the project as a whole and to demonstrate protection for peatlands, habitats, and land use interests contravenes the National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a substantial gap within the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The proposal, which includes the introduction of permanent red aviation lighting, would create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

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 oversight is critical, given the significance of dark skies to the community's identity and emerging sectors like astro-tourism. The absence of consideration for these impacts creates a notable deficiency in the overall landscape and environmental assessment.

Additionally, there is no analysis 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 heighten the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, failing to examine how the proposed aviation lighting may affect

these species or lead to increased mortality rates.

The situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. For example, Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of specific night-time data signifies a crucial gap in understanding the ecological implications.

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

From a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4 concerning the protection of natural environments and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts since the character of the night-time environment is an integral component of the ecosystem.

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

TOURISM

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

Tourism has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island’s economy. However, the proposal does not model the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or broader economic resilience. Without such an analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects the significance of environmental quality for tourism, especially the value of unspoiled landscapes and dark skies to visitor experiences, including growing markets like nature-based tourism and astro-tourism.

The failure to include a Dark Skies Assessment exacerbates this gap, leaving a considerable lack of understanding regarding impacts on an acknowledged and burgeoning segment of the local economy.

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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: 91D2E7FD

Member of the public 1427

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental impact, cultural considerations, and procedural aspects. The development site is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and robust cultural heritage. Concerns about the scale, proximity, and design of the proposed wind farm raise serious questions regarding its alignment with statutory obligations, national policies, and the principles of sustainable development.

The submission lacks a comprehensive evidential basis necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Many important elements of the proposal remain undefined. The flexible design framework employed makes it difficult to ascertain potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It has not demonstrated adherence to national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts relate directly to the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal in this particular location poses additional challenges, with large turbines positioned alarmingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy underscore that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle is paramount.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several significant deficiencies that undermine its reliability and completeness. Notably, the proposal's use of a flexible Project Design Envelope lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces uncertainty and obstructs the application of a worst-case scenario, consequently compromising the integrity of the assessment. As a result, the presented impacts may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from fully grasping the extent of environmental effects.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have not yet been defined. Seeking consent on the premise that environmental harm will be managed later impedes meaningful evaluation of the effectiveness of these measures and the assessment of any residual impacts. This approach, which defers crucial information to post-consent stages, is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to decision-making.

Evidential gaps are also evident, including deficiencies in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainties regarding the scale and significance of impacts, particularly where the report presents conclusions of negligible or non-significant effects without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, generating scientific uncertainties that are incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold stipulated by the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it has not demonstrated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposal lacks a comprehensive and evidence-based evaluation of alternative options, which is essential under the Environmental Impact Assessment requirements. Instead of offering a logical comparison of feasible alternatives based on their environmental consequences, the application outlines the project's development

history without demonstrating that less harmful options have been adequately considered or chosen over more damaging ones.

There is a notable absence of a transparent analysis of different offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely contemplated placing turbines further from the shore, where the potential for visual, ecological, and coastal impacts could be diminished. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impacts, this lack of analysis prevents any assertion that the proposed location is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, with insufficient evidence indicating that alternative paths have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to present a clear strategy for avoidance and the lack of comparative analysis signal that mitigation through design has not been prioritised, instead relying on post-design mitigation strategies.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This situation reflects a neglect of the established mitigation hierarchy, preventing the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough alternatives assessment, it cannot be determined that the proposal aligns with sustainable or policy-compliant practices.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and the well-being of communities. The failure to provide a structured and comparative assessment is a significant omission, reinforcing the conclusion that the application has not undergone adequate evaluation and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, lacking a comprehensive and reliable understanding of the ecological receptors present in this sensitive and biologically rich marine system. The methodologies employed are inadequate, resulting in incomplete baseline data that fails to accurately capture the presence, behaviour, and habitat use of various species. Consequently, this assessment does not offer a solid evidential basis for evaluating potential impacts.

One significant oversight concerns otters, which are recognised as a European Protected Species. The application does not adequately acknowledge or assess the active use of coastal areas by otters for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an insufficient assessment

of the potential effects of construction disturbances, noise, and increased activity. This gap undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to result in an underestimation of the presence of basking sharks, especially in light of established land-based observations that indicate these waters are frequently used by them. The omission of such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of adequate baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the true scale of risk posed to marine species and their habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with this application is deeply flawed, presenting significant gaps in evidence and inconsistencies that undermine its conclusions. It is critical to acknowledge that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate convincingly that these species will not suffer adverse effects. The development sits within essential foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A glaring contradiction arises within the application, where the developer asserts there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability, indicating that its conclusions lack the support of the necessary evidence.

The assessment falls short of providing sufficient proof that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed risk underestimating mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, placing turbines within a recognised migratory corridor introduces a considerable risk, effectively establishing 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 consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to affirm that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, paired with data deficiencies and modelling shortcomings, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation invokes the precautionary principle, ultimately preventing a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity related to the West Lewis coastline is fundamentally lacking. It does not recognise this area as a living cultural landscape where environment, language, tradition, and community are closely interlinked. Instead, the application treats heritage as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual relevance within the community.

One significant shortcoming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and centres of spiritual practice, yet they are categorised as static features in the assessment. This mischaracterisation ignores their continued use and meaning, as well as the impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete and fails to account for their significance in

community life.

Additionally, the assessment neglects intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but are entirely omitted, representing a major gap. Without addressing these factors, the cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with traits characteristic of Indigenous Peoples, yet no Free, Prior and Informed Consent process has been implemented. This lack of meaningful engagement undermines the assessment's legitimacy and does not align with established principles of participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is the absence of an Island Communities Impact Assessment, which is required by law under the Islands (Scotland) Act 2018. This omission means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

From a policy standpoint, these deficiencies directly conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, clearly diverges from policy requirements.

Ultimately, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations leads to a significant gap in evidence. The cultural impacts of the development have not been adequately evaluated, resulting in the application lacking a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with this development is alarmingly insufficient and lacks the necessary transparency for an effective evaluation. While the developer conducted a Social Impact Assessment that included focus groups with local residents, the full report has not been made public. This lack of disclosure creates a significant evidential gap, obstructing both the public and the competent authority from grasping the complete range of social risks identified in the developer's own study.

Available summaries reveal that local residents are already dealing with measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These issues arise directly from engagement with the community, thus they cannot be dismissed as speculative. Nonetheless, the absence of the comprehensive assessment hinders proper scrutiny of these findings and restricts the

ability to evaluate their significance in the decision-making process.

Moreover, there is clear evidence that this proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Unfortunately, these detrimental impacts have not been adequately reflected in the primary application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the actual human and social costs of the project.

This lack of transparency has severe implications for the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when the character and functionality of the community may be jeopardised. By failing to provide the complete dataset, the application does not offer a thorough evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm, yet the evidence currently available points to existing adverse effects that have not been fully revealed. Without the complete assessment, it cannot be demonstrated that the application meets this crucial policy requirement.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw within the application, failing to satisfy the evidential prerequisites of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is inadequate and does not sufficiently capture the sensitivity of the environment or the extent of change that would occur. The coastline of West Lewis is characterised by its unspoilt Atlantic horizon, undeveloped nature, and profound sense of remoteness. Introducing large-scale turbines near the shoreline would create a prominent industrial presence, fundamentally altering this character and resulting in an irreversible transformation of the landscape.

The application fails to represent the magnitude of the visual change accurately. Due to the scale and closeness of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual

amenity and undermine the qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of this impact within such a sensitive landscape context.

Methodological issues arise concerning the choice and presentation of visual viewpoints. There are indications that the viewpoints selected do not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding important cultural heritage sites and valuable landscapes. This underrepresentation raises concerns that the magnitude of visual impact has been downplayed, thereby affecting the reliability of the assessment.

Moreover, there is a failure to consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are interconnected within a wider landscape, sharing visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial harm that the application fails to address adequately.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the safeguarding of natural areas and historic assets. The extent of change conflicts with the requirements to protect landscape character, visual amenity, and the contexts of culturally significant sites. The lack of a thorough worst-case scenario assessment further weakens any assertions of policy compliance.

It is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Consequently, the resulting change would be both fundamental and permanent, rather than reducible to an acceptable level through mitigation.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal contradicts the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks lacks the necessary detail to adequately evaluate potential environmental effects. There is significant seabed preparation and installation work proposed within a high-energy Atlantic environment, yet the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on

mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful assessment of their effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is especially troubling. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these issues.

Further uncertainty surrounds the scale and behaviour of sediment plumes that would result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty also encompasses potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a stage after consent, the application prevents a thorough evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and diminishes the ability of the competent authority to properly assess the environmental protection measures before determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent, and without this information, a lawful determination cannot be reached. Moreover, the application does not adequately demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry; however, the proposal does not adequately demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

One major concern lies in the assumption that fishing activities can be displaced without negative consequences. The application offers no evidence that alternative

fishing grounds are available, accessible, or capable of accommodating increased pressure. This absence of information is critical, as displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based evaluation, understanding the impacts on fisheries and local livelihoods becomes impossible.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disrupt marine life across large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application appears to minimise the significance of these effects, lacking sufficient supporting evidence.

Furthermore, there is a troubling inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough evaluation of the onshore infrastructure, which is critical as it forms part of a singular integrated project alongside the offshore turbines. By assessing these components separately, the proposal adopts a fragmented approach, obscuring the true extent of the environmental and socio-economic repercussions. This is particularly concerning given the onshore elements, which involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through delicate landscapes. These activities involve excavation through deep peat areas, especially within Barvas Moor, a

crucial carbon store and ecologically sensitive habitat. As a result, the application does not deliver a complete assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

The failure to adequately assess the onshore impacts prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the disconnection between offshore and onshore elements means the combined effects on peatlands, habitats, and local communities remain largely unexamined. Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these vital habitats have been fully assessed or that appropriate measures to avoid harm have been implemented, creating a significant gap in the evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, potentially leading to a carbon debt that runs counter to the goals of renewable energy initiatives. The application does not adequately tackle this concern or provide assurance that the overall carbon balance remains favourable. Additionally, the routing of infrastructure through active croft land raises potential conflicts with current land use and legal rights. The lack of evidence confirming that the required consents or processes have been initiated casts doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and demonstrate adequate protections for peatlands, habitats, and land use interests contravenes both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Ultimately, the separation of the project components, the absence of a comprehensive assessment, and the lack of evidential support regarding environmental and land use impacts culminate in an incomplete and unreliable submission, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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. However, the Environmental Impact Assessment fails to consider dark skies and nocturnal wildlife, representing a serious oversight. The proposed development would introduce permanent red aviation lighting that would be visible over long distances. This would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to emerging tourism sectors like astro-tourism, this omission is particularly concerning. The application also neglects to

evaluate the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are at risk of disorientation and increased collision due to artificial lighting. The lack of any lighting impact assessment or phototaxis study means the potential effects on these species and their mortality risk remain unexamined.

This gap is made worse by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, known to forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data creates a critical void in understanding ecological impacts.

Without evaluating these nocturnal impacts, it is impossible to determine if protected species or designated sites would face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, triggering the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

TOURISM

The assessment of tourism impacts is critically inadequate and neglects to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is noted that 86% of visitors are attracted by the scenery; however, the application lacks a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contribution.

The tourism sector has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not model the potential impact that the industrialisation of the seascape and the degradation of environmental quality might have on Tourism Gross Value Added or the resilience of the broader economy. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

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

sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, leading to a considerable gap in understanding the effects on a recognised and expanding segment of the local economy.

In an island community with limited economic diversity, 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 means that these economic vulnerabilities have not been thoroughly examined as required by the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the island's economic dependency culminates in a significant evidential gap. This hinders a comprehensive assessment of 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.

Additional Comments

Neither climate change nor Net Zero are being helped by these wind turbines. The manufacture, construction, transportation and running maintenance of these masses of wind turbines use huge quantities of oil and fossil fuels. They are directly and critically damaging to biodiversity and the natural environment. They cannot be recycled when decommissioned because of the composit and toxic materials they are manufactured with. They are a complete environmental nightmare. These turbines are not the panacea to address climate change. Less damaging alternative renewable energy need to be developed instead of hugely damaging wind farms.

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: DEDD57D8

Member of the public 1428

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the relevant marine licensing and Environmental Impact Assessment regimes. It is grounded in a thorough examination of the Environmental Impact Assessment Report and accompanying documentation, revealing material deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the project, particularly its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application does not present a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, with baseline information being both limited and inconsistent. Moreover, significant aspects of the proposal remain undefined, and the use of a flexible design framework hinders a clear assessment of potential significant effects. The reliance on unspecified mitigation measures raises questions about their effectiveness, leading to an inability to fully understand the environmental, cultural, or community impacts. Consequently, claims suggesting negligible or non-significant effects lack robust evidential support.

There are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to prove that national requirements to protect biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly impact the statutory tests required for consent and compromise the capacity of the competent authority to determine the acceptability of the development in policy terms.

Unprecedented in scale for this location, the proposal involves large turbines situated in close proximity to the shoreline, which 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 indicates 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 material completeness and does not deliver a transparent or reliable account of the expected environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates considerable uncertainty. This situation hinders the consistent application of a worst-case scenario analysis. Consequently, the integrity of the assessment is compromised, meaning that the impacts presented may not accurately reflect the development that will ultimately be constructed. This deficiency obstructs both public and competent authority understanding of the true extent of the environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that environmental harm will be addressed later, which hampers a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly established before any determination.

Additional evidential deficiencies are apparent, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate 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 adequate information obscures a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application fails to meet the evidential threshold established under the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be shown that impacts have been comprehensively 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 collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. It lacks a structured and reasoned comparison of realistic alternatives based on environmental effects, instead presenting a narrative account of project evolution.

This method does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is no transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. The application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline, as well as the critical importance of proximity to shore in determining impact, the failure to conduct such analysis undermines any assertion that the proposed siting is the least damaging option.

The shortcomings also affect cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis indicates that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is significantly flawed, exhibiting notable gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already declining. 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 are situated in the development's location, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises in the application, as the developer asserts that no significant adverse effects will occur while simultaneously advancing a case for derogation under the Habitats Regulations. Such a case is only warranted when significant harm is anticipated, thus questioning the reliability of the assessment and

suggesting that its conclusions lack support from the underlying evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully accounted for, and the reliance on modelling methods introduces uncertainty, particularly for species in severe 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.

The placement of turbines within a recognised migratory corridor presents an additional and significant risk, potentially 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 within this corridor or the possible effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and prevents a lawful conclusion that could support consent.

The identified deficiencies also 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 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 inadequate evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a significant lack of thoroughness in its assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of static assets rather than a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. By adopting a reductive approach, it overlooks the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

A notable shortcoming is evident in the handling of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet they are inaccurately classified as static features. This failure to consider their continued use and meaning leads to an incomplete understanding of the cultural implications and neglects their vital role in community life.

Moreover, the assessment disregards intangible cultural heritage, which includes the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are central to the area's identity yet are entirely absent from the evaluation, marking a significant oversight. Without accounting for these factors, it becomes impossible to grasp the true cultural impact of the proposed development.

Concerns extend to community rights and engagement, especially considering that the Gaelic-speaking population embodies characteristics of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and fails to align with recognised principles of participatory decision-making that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement established 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 effects on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, the identified deficiencies place the application in direct contradiction with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy standards.

Collectively, the failure to address living heritage, intangible cultural value, community rights, and statutory requirements culminates in a considerable evidential gap. The cultural consequences of the development have not been adequately assessed, and the application lacks a sufficient basis for a proper evaluation of the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency concerning social impacts, health, and wellbeing is critically lacking, which undermines the evaluation process. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the absence of the full report constitutes a significant evidential gap. This lack of disclosure inhibits both public understanding and the competent authority’s assessment of the social risks highlighted in the developer’s own research.

According to available summaries, residents are already reporting measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct engagement and therefore should not be considered speculative. However, without the full assessment, there is inadequate scrutiny of these findings, limiting the ability to gauge their significance in the decision-making

process.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with evidence of “cultural loss” noted in the developer’s findings. Despite this, such impacts have not been properly integrated into the primary application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This absence of transparency further compromises the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. The failure to provide the complete dataset means the application does not furnish a thorough evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 with respect to health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that remain undisclosed. Without access to the complete assessment, compliance with this policy cannot be ascertained.

The procedural ramifications are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the non-disclosure of the full Social Impact Assessment. This represents a material omission within the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the overall assessment incomplete and unreliable. This situation obstructs a lawful determination and supports the conclusion that the application is insufficiently informed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. This unique character would face a permanent and irreversible transformation with the introduction of large-scale turbines near the shoreline, creating a continuous and dominant industrial presence. The application fails to adequately reflect the scale of change and the sensitivity of the receiving environment.

The visual impact of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the essential qualities of naturalness and remoteness. There are significant concerns regarding the selection and presentation of visual viewpoints, which may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests that the visual impacts

may have been understated, calling into question the reliability of the assessment.

Additionally, the assessment overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked visually and spatially to the Atlantic horizon. By treating these as isolated assets, the assessment fails to capture their interdependence, leading to an inadequate evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships and disrupt the context in which heritage assets are experienced, representing not only a visual impact but also a broader cultural and spatial harm that has not been properly assessed.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The magnitude of change is 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 undermines any claims of policy compliance.

The impacts identified are substantial and cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, with no possibility of reduction to an acceptable level through mitigation.

In summary, the assessment does not accurately capture the extent of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is materially deficient and does not include the detail needed to understand the likely environmental effects. The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, which hinders a meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly alarming. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to furnish adequate details on how these incidents will be prevented, controlled, or monitored.

There is significant uncertainty about the scale and behaviour of sediment plumes

resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive within the wider assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application prevents the evaluation of whether suitable safeguards are established to address pollution incidents. This creates procedural risks 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 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 that a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

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

importance of these impacts without adequate supporting evidence.

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

The evaluation also neglects to account for cumulative impacts resulting from various pressures such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately gauged.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to indicate that the development can coexist with current marine users or prevent unacceptable effects on marine biodiversity, thus hindering any conclusion that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application suffers from a fundamental lack of completeness in its assessment of onshore infrastructure, failing to address the full scope of impacts associated with what is essentially a singular integrated project. The offshore turbines and onshore works are inherently connected; however, they have been evaluated in isolation, leading to a fragmented understanding that conceals the true magnitude of both environmental and socio-economic consequences.

Onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure that traverses sensitive landscapes. These activities necessitate excavation through areas of deep peat, especially within Barvas Moor, which is a critical carbon store and ecologically vulnerable habitat. The application lacks a thorough assessment of these impacts, thus obstructing a complete comprehension of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application hinders a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively. Nonetheless, the disjointed treatment of offshore and onshore components means that the combined effects on peatlands, ecosystems, and local communities remain inadequately understood.

Moreover, there are considerable risks to delicate habitats, including machair systems and peatland environments that are under policy protection. The application fails to demonstrate that the impacts on these critical habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance due to potential disturbance of peatlands, which may release stored carbon and engender a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this matter or illustrates that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land presents possible conflicts with existing land use and legal rights. The application does not furnish evidence that necessary consents or processes have been initiated, calling into question the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect on the western horizon, which would fundamentally change the night-time environment.

Moreover, the application fails to evaluate how this lighting would impact visual amenity, landscape character, and the experiences of both residents and visitors. This lack of analysis is particularly troubling given the crucial role dark skies play in the region's identity and the growing sectors of tourism like astro-tourism. Consequently, the omission of these impacts creates a clear gap in the overall landscape and environmental assessment.

Of even greater concern is the absence of any evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide any lighting impact

assessment or phototaxis study, thereby neglecting to assess the potential effects of aviation lighting on these species and their mortality rates.

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

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse consequences. The evidential standard needed to rule out negative effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and obstructing a lawful determination.

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

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

TOURISM

The application presents a proposal that significantly lacks a thorough assessment of tourism impacts, particularly in regard to the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While it is stated that 86% of visitors are attracted by the scenery, the application does not provide a quantified analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution to the area.

In terms of economic significance, tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, with the sector supporting more than 1,000 jobs and constituting as much as 16% of the island's economy. However, the application neglects to model the potential impacts on Tourism Gross Value Added and the wider economic resilience resulting from the industrialisation of the seascape and a decline in environmental quality. Without this critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely affect an established and expanding sector.

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

bolstering tourism, including the significance of unspoiled landscapes and dark skies for visitor experiences. This is particularly relevant for burgeoning markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates the shortcomings of the evaluation, leaving a notable gap in understanding the effects on this recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. Furthermore, 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.

In summary, the collective deficiencies in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and acknowledging the island's economic reliance culminate in a substantial evidential gap. This lack of comprehensive evaluation significantly hampers the ability to assess 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 according to statutory duties, national policy, and evidential standards. The application reiterates the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determining the application. It lacks complete baseline data, utilises an undefined design envelope, depends on unspecified mitigation measures, and overlooks important impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant gap. These failures hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural areas, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be entirely refused.

Additional Comments

Having stayed two or three times in Bragar with a friend. I can't understand the stupidity of Crown Estate and partners inflicting this monumental, irreparable damage offshore & Onshore! It will totally kill tourism in so many ways.....Tourism is the lifeblood of the Locals and Islanders.
Stop this abomination in it's tracks now...not needed, not wanted anywhere in the Islands....even Scotland !!

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: 210DAD56

Member of the public 1429

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing notable deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns about the scale, proximity, and design of the project cast doubt on its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. Furthermore, the flexible design framework employed creates ambiguity regarding potential significant effects. The reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There exist clear and substantial conflicts with policy. The proposal demonstrates inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly challenge the statutory tests necessary for consent and compromise 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 positioned dangerously close to the shoreline. This raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance highlights the application's incompleteness and its inability to facilitate a lawful determination. In light of these considerations, it is imperative that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment submitted concerning marine ecology and protected species is fundamentally inadequate and fails to furnish a complete and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically active marine ecosystem, yet the existing baseline data is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis necessary for evaluating the potential impacts.

One significant shortcoming pertains to otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential consequences of construction disturbance, noise, and increased activity have not been thoroughly evaluated. This deficiency undermines any assertions regarding the absence of significant effects on this species.

The assessment of basking sharks also exhibits serious shortcomings, as reliance on aerial surveys 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 established land-based observations that indicate regular use of these waters. The failure to include or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws indicate that conclusions regarding negligible or non-significant effects are predicated on assumptions rather than on robust evidence. Furthermore, the lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, which encompasses seasonal variations and broader ecosystem interactions. This uncertainty raises questions 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, as it has not appropriately identified or assessed protected species. The level of uncertainty involved prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the granting of consent would not be lawful.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally insufficient, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intricately linked. The application adopts a reductive perspective, treating heritage merely as a collection of isolated and static assets, neglecting their continuous social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice; however, the assessment categorises them as static features. This mischaracterisation overlooks their ongoing use, meaning, and the implications of development on their surroundings, leading to an incomplete evaluation of cultural effects and disregarding their importance in community life.

Moreover, the assessment fails to include intangible cultural heritage, such as the Gaelic language and traditions, along with the long-standing relationship the community maintains with the coastal environment. These aspects are central to the area's identity but are entirely absent from the evaluation, marking a significant omission. The absence of these factors hinders a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity aligned with recognised characteristics of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not reflect established principles of participation in decisions affecting cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal 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 place the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is significantly lacking and fails to provide the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the complete report has not been made available. This represents a critical evidential gap, hindering both public understanding and the competent authority's grasp of the full range of social risks identified through the developer's own research.

Summaries that are available suggest that residents are already experiencing quantifiable stress, anxiety, and concern due to the scale and proximity of the proposal. These issues arise from direct engagement and are therefore factual. However, the inability to disclose the entire assessment prevents adequate scrutiny of the findings and restricts the capacity to ascertain their significance within the decision-making framework.

There is also an indication that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Nevertheless, these impacts have not been fully incorporated into the primary application or given sufficient consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function may be jeopardised. By failing to provide the comprehensive data, the application does not offer a complete evidential basis for evaluating the balance between potential benefits and detriments.

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

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a material omission within the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of ongoing adverse effects, renders the assessment incomplete and unreliable. This situation impedes a lawful determination and supports the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented within the application fails to adequately capture the scale of change and the sensitivity of the West Lewis environment. The coastline is characterised by its open Atlantic horizon, undeveloped landscape, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would result in a significant industrial presence, leading to a permanent and irreversible alteration of this distinctive character.

Furthermore, the evaluation lacks an accurate representation of the visual impact anticipated from the turbines. Their scale and proximity would dominate views from residential zones, historic sites, and popular coastal areas, thereby negatively affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of this impact within the context of such a sensitive landscape.

There are also critical methodological shortcomings in the selection and depiction 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 valued landscapes. This oversight raises concerns that the visual impact may have been understated, thereby compromising the assessment's overall reliability.

Another notable deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and various Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and their link to the natural horizon. This goes beyond merely a visual impact, constituting a broader cultural and spatial detriment that has not been properly considered in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which emphasises the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further detracts from any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Thus, the resulting changes would be fundamental and permanent, not amenable to acceptable levels of reduction through mitigation measures.

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 significant deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application is materially deficient due to the absence of defined mitigation measures and a lack of detailed management plans, which collectively prevent a robust evaluation of construction and pollution risks. The assessment of these risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. This uncertainty extends to the potential effects on already identified sensitive marine species and habitats.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not contain fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined future measures to be developed post-consent, which raises significant concerns given the sensitivity of the receiving environment. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to assess environmental protection measures at the point of determination. This introduces procedural risk that further complicates the evaluation of appropriate safeguards to respond to pollution events.

From a regulatory standpoint, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed prior to consent; the absence of this information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality. Taken as a whole, these shortcomings reinforce the conclusion that the application is incomplete and unfit for approval.

FISHERIES AND MARINE LIFE

The proposal raises serious concerns regarding its impact on fisheries and marine life, particularly as it pertains to the waters off the West Lewis coast, which sustain a diverse marine ecosystem and an active fishing industry. The application does not adequately demonstrate that the ecological and socio-economic needs of these areas will be protected or maintained without significant disruption.

A major issue lies in the assumption made by the application that fishing activity can be displaced without any consequences. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This absence of information is critical, as it raises the risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear and evidence-based evaluation, the potential impacts on both fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to the underwater noise generated during construction. High-energy hammer piling over an extended period is expected to create disturbances that could affect a wide range of species, including dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population should be of serious concern, yet the application downplays the severity of these effects and lacks sufficient supporting evidence.

Moreover, there is an apparent inconsistency within the application, which acknowledges the requirement for licenses to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues of compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, which constitutes a significant evidential gap. The West Lewis coastline is renowned for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red

aviation lighting that will create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

This application fails to assess the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to local identity and emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. Furthermore, there is no evaluation of the impacts on nocturnal wildlife, including sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are affected by artificial lighting due to phototaxis. This can result in disorientation and increased collision risk. The absence of a lighting impact assessment or phototaxis study means that there is no consideration of how aviation lighting may affect these species or contribute to mortality.

The ornithological assessment's reliance on daytime survey data fails to capture nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, also face disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data leads to a critical gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the broader evaluation of landscape and seascape impacts, as night-time character is a vital component of the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The assessment of the proposed development fails to adequately consider the impacts on tourism, a vital component of the Isle of Lewis economy. Tourism relies heavily on the area's natural assets, such as its wild coastline, unspoiled landscapes, dark skies, and overall sense of remoteness. Although the application indicates that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers or their behaviour, nor does it assess the potential effects on the overall economic contribution from tourism.

Tourism on the island has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs, representing up to 16% of the local economy. Nonetheless, the application lacks a thorough examination of how the industrialisation of the seascape and potential decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it remains unclear whether the proposed

development would provide a net economic benefit or adversely affect this essential sector.

Moreover, the assessment neglects to acknowledge the significance of environmental quality for tourism, particularly how pristine landscapes and dark skies enhance the visitor experience and contribute to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a substantial gap in understanding the potential implications for this recognised and expanding segment of the local economy.

In an island community that faces challenges due to limited economic diversification, the failure to evaluate tourism impacts carries broader consequences for employment, local enterprises, and the sustainability of the community. The absence of a proper Island Communities Impact Assessment means that the economic vulnerabilities associated with tourism have not been appropriately addressed, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate a net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and lacks the necessary evidence for competent authorities to gauge the economic ramifications of the proposal.

Ultimately, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic reliance culminate in a significant evidential shortfall. This gap hampers the ability to carry out a comprehensive evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This proposal mirrors the fundamental issues that led to the refusal of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was highlighted. Although the current submission is made under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A reliable evidential basis for determination is notably absent in the application. Critical gaps in baseline data, the reliance on an undefined design envelope, and unspecified mitigation measures contribute to this inadequacy. Furthermore, the omission of key impact pathways, such as those affecting nocturnal wildlife, the full onshore infrastructure, and tourism impacts, render the Environmental Impact Assessment incomplete. This deficiency hinders a comprehensive understanding of likely significant effects or residual impacts.

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

The proposal directly conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage. Additionally, there is a lack of evidence to support acceptable health and wellbeing impacts, as well as a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, which obscures the implications for 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 internally inconsistent. The evidential threshold required to demonstrate that adverse effects are excluded beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of the 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, disruption of cultural and visual relationships, and the effects on tourism are all permanent impacts that cannot be adequately mitigated.

Collectively, these issues render the application both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks prevents an evidence-based decision. The competent authority must either refuse consent based on these grounds or exercise the relevant regulatory provisions to mandate the submission of the 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.

Additional Comments

I wish to formally object to the proposed offshore wind turbine development off the coast of the Isle of Lewis.
I have lived on the island since I was 14 years old and currently live in Stornoway. Lewis is not simply somewhere I reside — it is my home, the place where I have raised my family, built my life, and where generations of people have lived in close relationship with the land and sea. I believe this proposal risks causing irreversible harm to the natural environment, marine ecosystem, cultural heritage, landscape, and way of life

that make this island unique.
One of my greatest concerns is the potential impact on marine life and the wider ecosystem. The waters surrounding Lewis are home to diverse wildlife, including seabirds, dolphins, whales, seals, and fragile marine habitats that are already under increasing environmental pressure. Large-scale industrial developments at sea inevitably bring risks through underwater noise pollution, disruption during construction, increased vessel traffic, and long-term ecological disturbance. I do not believe enough certainty exists regarding the cumulative environmental impact such a project could have on our coastal waters and wildlife populations over time.
I am also deeply concerned about the impact this proposal would have on the landscape and cultural identity of the island. The natural beauty of Lewis is internationally recognised. Our open seascapes, dark skies, unspoiled coastline, and connection to nature form part of the island's heritage and character. These landscapes are not empty spaces waiting for industrialisation; they are part of the identity, wellbeing, and history of the people who live here. Once altered on this scale, that loss cannot truly be undone.
Tourism is another major concern. Many visitors travel to Lewis specifically because of its untouched scenery, wildlife, peace, and distinctive Hebridean environment. Tourism supports local businesses, hospitality, artists, craftspeople, and the wider local economy. Industrialising the surrounding seascape risks undermining the very qualities that attract people to the island in the first place.
Beyond economics, there is also the issue of quality of life for island residents. Many people who live here value Lewis for its slower pace of life, natural surroundings, and strong connection to the environment. There is growing concern within communities that the islands are increasingly being treated as locations for large-scale energy infrastructure projects without sufficient regard for the people who actually live here year-round and the cumulative impact these developments are having on our communities and environment.
While I recognise the importance of renewable energy and the need to address climate change, I do not believe this proposal strikes the right balance between environmental responsibility and protection of fragile island ecosystems and communities. Renewable energy should not come at the expense of marine biodiversity, cultural heritage, landscape preservation, and the wellbeing of local residents.
For these reasons, I strongly object to the proposed offshore wind turbine development off the coast of Lewis.

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: 2DA4EA75

Member of the public 1430

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report and other relevant documents, revealing serious deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. There are fundamental issues regarding the scale, design, and proximity of the proposal in relation to statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation for a lawful decision. There is a lack of critical environmental data, limited and inconsistent baseline information, and many aspects of the proposal remain undefined. The flexible design framework complicates the assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially regarding biodiversity, natural areas, cultural heritage, and public health. It does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine if the development aligns with policy requirements.

The proposal's scale is unprecedented for this area, with large turbines located near the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental repercussions. In light of the insufficient information, reliance on unclear mitigation strategies, evidential shortcomings, and clear policy non-compliance, it is apparent that the application is incomplete and does not support a lawful decision. Therefore, the precautionary principle should be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies and lacks a comprehensive, transparent, or reliable analysis of the potential environmental impacts of the proposed development. The adoption of a flexible Project Design

Envelope, which lacks commitments to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This uncertainty hinders the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the assessment. Consequently, the impacts described may not accurately represent those associated with the eventual construction, which obstructs both the public and the competent authority from grasping the true extent of the environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. This reliance implies that any environmental harm will be resolved post-consent, thereby impeding any substantive evaluation of the effectiveness of these measures or assessment of residual impacts. Such deferral of crucial information to later stages is procedurally unacceptable and contradicts the core intent of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation strategies be clearly established before determination.

Moreover, substantial evidential gaps exist within the report, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of the impacts, especially when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of both cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been established 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 gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects and mean the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is significantly lacking and does not fulfil the statutory requirements outlined in the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of viable alternatives based on their environmental effects, instead offering a narrative account of the project's evolution. This method does not demonstrate that less harmful options have been thoroughly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent and evidence-based comparisons of 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 lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such analysis prevents any conclusion that the proposed siting is indeed the least damaging option.

The shortcomings extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been properly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation through design has not been effectively employed, with an overreliance on post-design mitigation measures instead.

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

From a policy standpoint, this deficiency calls into question compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive and reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the methodologies used are inadequate, resulting in incomplete baseline data that do not capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for properly evaluating potential impacts.

A significant oversight is the failure to adequately recognise and assess the presence of otters, a species protected under European law, particularly concerning their foraging and movement within coastal zones. The neglect of their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction-related disturbances, such as noise and increased human activity. This omission undermines any claims made about the absence of significant effects on this species.

The assessment of basking sharks reveals further weaknesses, with an over-reliance on aerial surveys that carry a substantial risk of detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations showing their regular use of these waters. The lack of proper consideration of such pertinent data results in an incomplete baseline, further diminishing the reliability of the conclusions reached.

These methodological shortcomings indicate that conclusions regarding negligible or non-significant effects stem from assumptions rather than solid evidence. The inadequate baseline data also hinder a thorough evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. As a result, there remains considerable uncertainty concerning the actual risks posed to marine species and habitats.

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

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment unreliable. These significant deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable, presenting significant internal inconsistencies and substantial gaps in evidence that undermine its findings. Key foraging areas and migratory pathways, essential for the internationally important seabird populations along the west coast of the Isle of Lewis, are not adequately protected. The application fails to demonstrate, with the required evidential standard, that these species will remain unaffected. Moreover, the siting of turbines within a recognised migratory corridor creates considerable risks, as it potentially acts as a barrier for species migrating between the United Kingdom and Iceland.

A glaring contradiction exists, wherein the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and raises concerns that its conclusions are unsupported by the evidence. The methodologies used in the assessment appear to underestimate potential mortality, particularly given that baseline data is lacking and behavioural responses of the species are not well

understood.

Furthermore, the assessment does not sufficiently consider the seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, or fully account for the importance of their feeding grounds. The reliance on modelling approaches adds a layer of uncertainty, especially for species already experiencing severe declines, such as Kittiwakes and Fulmars.

From a regulatory viewpoint, the application does not meet the evidential threshold required to establish no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful conclusion in support of consent.

In addition, the identified deficiencies constitute 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 in direct conflict with national policy. Collectively, these factors lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

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 assessment regarding social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This situation creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted in the developer's own research.

Summaries available suggest that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not merely speculative. Nevertheless, the absence of the complete assessment obstructs proper scrutiny of the findings and diminishes the capacity to assess 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 findings. Yet, these impacts have not been adequately incorporated into the main application or given the appropriate consideration they warrant. The failure to disclose the full Social Impact Assessment thus conceals the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and

functioning are at stake. By withholding the full dataset, the application does not provide a comprehensive evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must promote positive health outcomes and avoid harm; however, the evidence available points to existing adverse effects that remain undisclosed. Without the complete assessment, compliance with this policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This constitutes a material omission within the application and indicates a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to release the full Social Impact Assessment, coupled with evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and strengthens the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is severely lacking, failing to adequately reflect both the sensitivity of the receiving environment and the scale of the proposed changes. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would result in a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The proposal does not adequately convey the extent of this visual change. The proximity and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and erode the defining attributes of naturalness and remoteness. Moreover, the assessment fails to fully articulate the significance of these impacts in the context of such a sensitive landscape.

Methodological issues are also present in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, thus compromising the reliability of the assessment.

There is a notable deficiency in recognising the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are linked to the wider landscape through visual and spatial relationships to the Atlantic horizon. The assessment treats these

important cultural assets as isolated rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape could sever these crucial relationships, transforming the context in which heritage assets are perceived and interrupting their connection to the natural horizon. This not only constitutes a visual impact but also represents broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertions of policy compliance.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resultant change would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to adequately assess construction and pollution risks, which is particularly troubling given the environmental sensitivity of the West Lewis coastline. This area is known for its clean coastal waters and significant habitats, which are at risk from sediment disturbance and potential contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide comprehensive information on how these risks will be prevented, controlled, or monitored.

The proposal entails considerable seabed preparation and installation activities in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures that would only be formulated after consent is granted. This deferral is concerning, as it hampers any meaningful evaluation of the adequacy and effectiveness of these measures.

Further complicating the assessment is the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable

installation. Without robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of such impacts. This uncertainty also raises questions about the potential effects on marine species and habitats that have already been identified as sensitive in broader assessments.

Moreover, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs any assessment of whether sufficient safeguards will be in place to manage pollution events. This not only introduces procedural risks but also undermines the authority's capability to evaluate environmental protection measures at the time of determination.

From a regulatory viewpoint, the omission of vital environmental safeguards is in direct conflict with the stipulations of the Environmental Impact Assessment regime. Assessments of likely significant effects and required mitigations must occur prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short in demonstrating compliance with policies that pertain to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts collectively render the assessment significantly deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the protection of marine species, particularly in relation to the underwater noise that will be generated during construction. The anticipated high-energy hammer piling could cause disturbances over considerable distances, with potential impacts on species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population is alarming. However, the application appears to minimise the importance of these effects, lacking sufficient supporting evidence to justify such an oversight.

Moreover, the assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a vibrant marine ecosystem and a thriving fishing industry. Nevertheless, the application does not adequately demonstrate that these vital uses and habitats can be safeguarded from significant disruption.

A key concern lies in the assumption made by the applicant that fishing activity can be displaced without any repercussions. There is a notable absence of evidence indicating that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This lack of information is particularly concerning, as displacement could lead to overfishing in other areas and may have broader economic

ramifications for the local fishing fleet. The absence of a clear and evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

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

There are also discrepancies within the application regarding the need for licences to allow harm to European Protected Species. While the application acknowledges this requirement, it simultaneously describes potential impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

From a policy standpoint, the application does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, which ultimately hinders any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current application lacks a comprehensive assessment of onshore infrastructure, which is essential for understanding the full impact of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they have been evaluated separately. This fragmented assessment obscures the true scale of environmental and socio-economic effects, leaving critical issues unaddressed.

The onshore components include cabling through protected moorland and the construction of a substation near Stornoway, as well as the necessary access infrastructure across sensitive landscapes. This work entails excavation in deep peat areas, particularly within Barvas Moor, which is a vital carbon store and an ecologically significant habitat. By not providing a thorough assessment of these impacts, the application fails to convey the project's overall environmental footprint accurately.

Moreover, the application neglects the cumulative effects associated with the project by excluding or postponing the evaluation of onshore impacts. The Environmental Impact Assessment process mandates that all project elements be reviewed

collectively; however, the distinct treatment of offshore and onshore components results in a lack of understanding regarding the combined impacts on peatlands, habitats, and local communities.

Risks to sensitive habitats, such as machair systems and peatland environments, are also significant and should be noted, especially since these areas are subject to policy protection. The proposal does not adequately demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This oversight contributes to an evidential gap concerning biodiversity protection.

Concerns related to carbon balance are another critical aspect. The disturbance of peatland can release stored carbon, which may lead to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application has not supplied evidence that the appropriate consents or processes have been initiated, casting doubt on the project's deliverability and lawful execution.

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

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts culminate in an incomplete and unreliable application, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it lacks consideration of dark skies and nocturnal wildlife, which are crucial elements of the West Lewis coastline's environmental quality and cultural identity. The area's exceptionally dark skies contribute significantly to its tourism value, yet the proposal introduces permanent red aviation lighting that creates an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Additionally, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This oversight is particularly concerning given the rising significance of dark skies in promoting emerging tourism sectors like astro-tourism. The lack of a comprehensive assessment regarding these aspects represents a significant gap in the landscape and environmental evaluation.

Moreover, there is an absence of analysis regarding the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and increased risks of collision. The proposal does not encompass any impact assessment related to lighting or phototaxis studies, leaving an unaddressed question regarding how such aviation lighting may endanger these species or contribute to their mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates the issue, as it overlooks nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, but this risk has not been evaluated. The lack of site-specific night-time data creates a critical shortfall in comprehending the ecological impacts involved.

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

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, they undermine the overall assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

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

TOURISM

The assessment of tourism impacts within this application is fundamentally inadequate, neglecting to examine the economic and social repercussions 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 its unique sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Since 2017, tourism has seen remarkable growth, expanding from £65 million to over £81.5 million, while supporting over 1,000 jobs and comprising up to 16% of the island's economy. Despite this progress, the application does not evaluate how the industrialisation of the seascape and the degradation of environmental quality would affect the Tourism Gross Value Added or broader economic resilience. Without such

essential analysis, it remains unclear whether the proposed development would generate a net economic benefit or detract from an established and expanding sector.

Moreover, the assessment overlooks the critical role that environmental quality plays in fostering tourism, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experiences. This gap is further exacerbated by the absence of a Dark Skies Assessment, which hinders understanding of the impacts on an acknowledged and growing segment of the local economy, such as nature-based tourism and astro-tourism.

For an island community that faces limited economic diversification, the failure to thoroughly assess tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Additionally, the lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and does not furnish sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency hampers a comprehensive 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 criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It replicates the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting the project under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not remedy these shortcomings.

There are significant deficiencies in the evidential basis for the application. It lacks comprehensive and reliable baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it omits crucial impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As such, the Environmental Impact Assessment is incomplete, failing to provide an adequate understanding of the likely significant effects or residual impacts.

Procedural oversights are also evident. The absence of a compliant Island

Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment represents 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.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it show that health and wellbeing impacts are acceptable. There is also a lack of evidence for a net economic benefit due to the absence of tourism impact modelling, and the cumulative effects of both offshore and onshore elements have not been adequately assessed, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, thus 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, loss of dark skies, disruption to cultural and visual relationships, and adverse effects on tourism would result in permanent changes that cannot be mitigated to an acceptable level.

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

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

Additional Comments

For each and every reason above. No benefit to this community. A beautiful Island that should be proteced & given National park status, treasured not ruined by the impact of this monstrosity.

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: 3F0276EE

Member of the public 1431

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

Dear Sir/Madam

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

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

There are clear and substantive conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are central to the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents numerous deficiencies that render it unreliable and incomplete. It heavily relies on undefined mitigation measures, monitoring strategies, and management plans that have not yet been articulated. This approach seeks consent based on the premise that environmental harms will be managed in the future, thus obstructing any meaningful evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Deferring critical information to the post-consent stage is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates the clear establishment of significant effects and their mitigation before any determination is made.

Additionally, there are considerable gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when claims of negligible or non-significant effects are not backed by robust data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty incompatible with statutory obligations.

Moreover, this application does not meet the evidential threshold stipulated under the Habitats Regulations, as it fails to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, as it does not demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

The reliance on a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, fosters significant uncertainty that hinders a consistent application of a worst-case scenario. Such a lack of commitment undermines the integrity of the assessment, meaning that the impacts presented may not truly represent the development ultimately constructed. Consequently, the competent authority and the public are left without a clear understanding of the actual environmental effects, which further complicates the decision-making process.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This area represents a sensitive and biologically vibrant marine system, yet the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not establish a solid evidential foundation for evaluating impacts.

A significant shortcoming involves otters, a species afforded protection under European law, as the application inadequately acknowledges and assesses their active utilisation of coastal regions for foraging and movement. This oversight regarding their

core foraging range and behaviour results in an insufficient evaluation of the potential effects stemming from construction disturbances, noise, and heightened activity. As a result, the conclusions regarding the absence of significant effects on this species are fundamentally undermined.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate a regular occurrence of these sharks in the waters concerned. The neglect to incorporate or adequately consider such data culminates in an incomplete baseline, further eroding the reliability of the conclusions drawn.

These methodological shortcomings indicate that the assertions of negligible or non-significant effects rely more on assumptions than on sound evidence. The lack of adequate baseline data also hinders a meaningful analysis of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This results in considerable uncertainty about the actual extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime as well as the National Planning Framework 4, due to the improper identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is not legally permissible to grant consent.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a full disclosure of the Social Impact Assessment, which is crucial for understanding social impacts, health, and wellbeing. The developer has conducted focus groups with local residents but has not published the complete report. This creates a significant gap in evidence and inhibits both public understanding and the competent authority's ability to assess social risks identified in the developer’s research.

Residents have reported measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, not speculation. However, without the full assessment, the findings cannot be properly scrutinised, limiting the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” found in the developer’s own results. Unfortunately, these impacts have not been adequately integrated into the application or given sufficient consideration. The absence of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means the application does not present a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and avoid harm, yet the evidence currently available indicates existing adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural implications of this situation are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing negative impacts, makes the assessment incomplete and unreliable. This inhibits a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts lacks sufficient detail and fails to represent the true extent of change to the environment and the sensitivity of the area. The coastline of West Lewis features an unspoilt Atlantic horizon, characterised by its undeveloped nature and a profound sense of remoteness. Should large-scale turbines be positioned near the shoreline, they would introduce a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible change in the landscape.

Moreover, the application does not adequately capture the magnitude of the visual change anticipated. The turbines would dominate the vistas from nearby residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities that define naturalness and remoteness. The assessment inadequately conveys the significance of this impact within such a sensitive landscape context.

Methodological issues also arise from the selection and presentation of visual viewpoints, which may not effectively represent the most sensitive receptors or worst-case scenarios. This is particularly relevant for key cultural heritage sites and areas of high landscape value. Such shortcomings risk underestimating the magnitude of visual impact, which undermines the reliability of the assessment process.

Additionally, the assessment neglects to consider the interconnected relationship among landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. This evaluation treats these assets in isolation, failing to recognise their interdependence and resulting in an incomplete assessment of impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated changes are at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines claims 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 overwhelming and unavoidable. Consequently, the nature of this change is fundamental and permanent, rather than something that could be diminished to an acceptable level through mitigation strategies.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is materially deficient and does not include the detail needed to understand the likely environmental effects. The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, which hinders a meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly alarming. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to furnish adequate details on how these incidents will be prevented, controlled, or monitored.

There is significant uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive within the wider assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application prevents the evaluation of whether suitable safeguards are established to address pollution incidents. This creates procedural risks 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 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 that a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding carbon balance. Disturbance of peatland areas releases stored carbon, which could create a carbon debt that undermines the aims of renewable energy development. The application fails to adequately tackle this issue or prove that the overall carbon balance remains positive.

Additionally, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is a lack of evidence demonstrating that the necessary consents or processes have been initiated, which raises serious doubts about the project's deliverability and lawful implementation.

The assessment of onshore infrastructure is materially incomplete, neglecting the full extent of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked but are evaluated separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects. The onshore components include cabling across protected moorland, construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation across areas of deep peat, particularly within Barvas Moor, which is a critical carbon store and ecologically sensitive habitat. The application does not deliver a thorough assessment of these impacts, thus preventing a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all elements of a project are considered collectively, yet the separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and communities are not fully grasped.

There are notable risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This signifies a clear evidential gap in the context of biodiversity protection.

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 conflicts with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the reliability of the application. Collectively, the separation of project components, the lack of comprehensive assessment, and the absence of evidence regarding environmental and land use impacts make this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly fails to address the assessment of dark skies and nocturnal wildlife, representing a notable omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the identity of the region and to emerging tourism sectors such as astro-tourism, this oversight presents a significant gap in the overall

landscape and environmental assessment.

Additionally, the absence of an evaluation of impacts on nocturnal wildlife raises further concerns. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased collision risks. The lack of a lighting impact assessment or a phototaxis study fails to examine how aviation lighting may impact these species and increase mortality rates.

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

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and prevents 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 overall assessment of landscape and seascape impacts, as the character of the night-time environment is an essential component of the ecosystem.

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

TOURISM

The application does not sufficiently assess tourism impacts, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced remarkable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality would impact Tourism Gross Value Added or the wider economic resilience. Without such

analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise a well-established and growing sector.

The assessment fails to recognise the significance of environmental quality in sustaining tourism, especially regarding the value of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

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

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

In sum, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency culminates 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 fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being submitted under a policy framework that emphasizes biodiversity, peatland conservation, landscape integrity, and community wellbeing more strongly.

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

There are notable procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligations under

the Islands (Scotland) Act 2018. Moreover, the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

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

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

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

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: A8B1887E

Member of the public 1432

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and supporting documents has uncovered material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The site is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, particularly in relation to statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential aspects of the proposal remain undefined. The flexible design framework employed obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, while assertions of negligible or non-significant effects are not substantiated by robust evidence.

Policy conflicts are both clear and substantive. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and impede the competent authority's capacity to determine the development's acceptability from a policy perspective.

The unprecedented scale of the proposal presents significant concerns regarding landscape capacity, visual dominance, and environmental impact, with large turbines positioned near the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for lawful determination. In light of these issues, 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.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and dependable understanding of the ecological receptors present in this sensitive marine area. The baseline data is insufficient, and the methodologies employed do not effectively

capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment fails to establish a credible evidential basis for understanding potential impacts.

Particularly concerning is the oversight regarding otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active usage of coastal regions for foraging and movement. This oversight neglects critical factors such as their core foraging range and behavioural patterns, leading to an inadequate assessment of the potential impacts stemming from construction activities, noise, and increased human activity. Such gaps significantly undermine any assertions regarding the lack of significant effects on this species.

Additionally, the assessment of basking sharks suffers from deficiencies, primarily due to an over-reliance on aerial surveys that introduce substantial detection bias, especially under Atlantic conditions. This methodological approach is likely to underreport the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent utilisation of these waters. The failure to integrate or properly consider such data culminates in an incomplete baseline, thus diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects being based on conjectures instead of robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the genuine level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment framework and National Planning Framework 4, given that protected species have not been sufficiently identified or evaluated. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, lawful consent cannot be granted.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These inadequacies obstruct a thorough evaluation of the potential impacts on marine ecology and protected species, leading to the overarching conclusion that the application is devoid of a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that severely undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to meet the required evidential standard to demonstrate that these species will not

be adversely affected. The development's location within key foraging areas and migratory pathways is critical, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application, as the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence. Furthermore, the assessment does not provide sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is insufficiently considered, and reliance on modelling approaches introduces considerable uncertainty, particularly for species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality rates, particularly when baseline data is incomplete and behavioural responses are not fully understood.

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

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and undermines the legal basis for a conclusion in support of consent. The deficiencies noted also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings obstruct a robust evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a living cultural landscape. The connection between the environment, language, tradition, and community is overlooked in the application, which adopts a reductive view of heritage as isolated and static assets, rather than considering their dynamic social, cultural, and spiritual roles within the community.

Significant deficiencies arise in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are classified in the assessment as static features, neglecting their ongoing use and significance. This mischaracterisation leads to an incomplete evaluation of cultural effects and fails to appreciate the cemeteries' role in community life.

Moreover, the application does not address intangible cultural heritage elements, which include the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, resulting in a substantial oversight. Without considering these elements, the true cultural impact of the development cannot be comprehensively understood.

There are also critical issues concerning community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's credibility and does not align with the established principles regarding participation in matters that affect cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal responsibilities to evaluate the social, cultural, and economic repercussions on the island community, thereby hindering a lawful determination of the application.

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

In conclusion, the failure to adequately consider living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The assessment does not properly evaluate the cultural impacts of the development, nor does it provide a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development is fundamentally lacking in transparency and completeness, which are essential for a lawful evaluation. Although the developer engaged in a Social Impact Assessment and conducted focus groups with local residents, the absence of the full report creates a significant evidential gap. This lack of information restricts both public

understanding and the competent authority's ability to gauge the full spectrum of social risks highlighted by the developer's own research.

Available summaries suggest that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct community engagement and are not based on speculation. Nevertheless, the failure to release the complete assessment undermines thorough scrutiny of the findings and constrains the evaluation of their implications within the decision-making process.

Furthermore, there is notable evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with references to "cultural loss" featured in the developer's own findings. Despite this recognition, these critical impacts have not been adequately incorporated into the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs of the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functionality may be at stake. The failure to provide the full dataset means that the application does not present an adequate evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Development proposals are required to foster positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been thoroughly disclosed. Without access to the full assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the complete Social Impact Assessment. This omission represents a significant flaw within the application and constitutes a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, along with existing evidence of adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and further emphasises that the application is inadequately supported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would create a dominant industrial presence, fundamentally

changing this character and leading to a permanent and irreversible alteration of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and does not adequately reflect the magnitude of this change or the sensitivity of the receiving environment.

The application fails to fully represent how visual amenity would be impacted. The scale and proximity of the turbines mean that they would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This oversight erodes the defining qualities of naturalness and remoteness in the area. Furthermore, the methodology employed in selecting and presenting visual viewpoints raises significant concerns. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This may lead to an understatement of the visual impact, undermining the reliability of the assessment.

Another critical deficiency is the lack of assessment regarding the interconnectedness of landscape, seascape, and cultural heritage. Sites like 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 sites as isolated, ignoring their interdependence, which results in an incomplete understanding of the impacts on their cultural significance and setting. The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the protection of natural areas and historic assets. The scale of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further jeopardises claims of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is thus fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation. In conclusion, the assessment does not accurately depict the scale of impact, the environment's sensitivity, or the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This results in an incomplete assessment of construction and pollution risks, hindering any meaningful

evaluation of likely environmental effects. Instead, the application depends on undefined future mitigation and contingency measures, which raises concerns about their adequacy and effectiveness in such a sensitive environment.

The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not provide sufficient detail on prevention, control, or monitoring measures. Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes that could arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological effects of these impacts, including potential consequences for sensitive marine species and habitats identified in the wider assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to evaluate whether appropriate safeguards are in place to handle pollution events. This introduces procedural risks and conflicts with the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be assessed prior to consent. The application also fails to demonstrate compliance with environmental protection and water quality policy requirements. Collectively, these deficiencies highlight that the absence of defined mitigation measures and the lack of detailed management plans render the assessment materially inadequate, preventing a robust evaluation of construction and pollution risks.

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 current application presents an inadequate assessment of fisheries and marine life, failing to robustly evaluate ecological or socio-economic impacts. There is a significant concern regarding the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are available or can absorb additional pressure, raising the risk of overfishing in other areas, which could have far-reaching economic consequences for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. High-energy hammer piling over an extended duration is likely to disturb marine life across vast distances, notably affecting species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application diminishes the significance of these effects without adequate supporting evidence.

Moreover, there is an evident inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while concurrently describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without an exhaustive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic environment.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

Furthermore, the exclusion or deferral of assessing onshore impacts compromises the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the distinct assessment of offshore and onshore elements fails to account for the combined impacts on peatlands, habitats, and local communities. This separation raises concerns regarding sensitive habitats, including machair systems and peatland environments that are already protected by policy. The application does not adequately

demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission in the Environmental Impact Assessment. The coastline of West Lewis features exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive light effect across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important as dark skies play a critical role in the area's identity and the growth of sectors like astro-tourism. The absence of this analysis creates a clear gap in the overall landscape and environmental assessment.

Moreover, impacts on nocturnal wildlife have not been evaluated. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The application fails to include any assessment of lighting impacts or phototaxis studies, meaning the potential effects on these species and the risk of increased mortality remain unexamined.

This issue is further complicated by the reliance on daytime survey data in the

ornithological assessment, which does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

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

From a policy standpoint, this omission goes against National Planning Framework 4 concerning the protection of natural places and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time is an essential part of the environment.

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

TOURISM

The proposed development has significant implications for tourism on the Isle of Lewis, a sector that is integral to the local economy. Tourism is reliant on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. The application recognises that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the economic contributions associated with tourism.

Economic growth within tourism has been notable, with revenue increasing 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 island's economy. However, the application does not assess how the industrialisation of the seascape and the potential decline in environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis creates uncertainty regarding whether the development could yield a net economic benefit or adversely affect an established and burgeoning sector.

Moreover, the assessment neglects to examine the critical role that environmental quality plays in attracting tourists. Unspoiled landscapes and dark skies are essential to enhancing visitor experiences and tapping into 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 impacts on this evolving aspect of the local economy.

In a community that already faces challenges due to limited economic diversification,

the oversight in assessing tourism impacts carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities tied to tourism have not been properly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to show 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 ramifications of the proposal.

In summary, the inability to quantify tourism impacts, assess environmental influences on visitor behaviour, and consider the island's economic reliance leads to a significant evidential gap. This gap hinders a thorough evaluation of economic effects, reinforcing 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.

Additional Comments

N4 will ruin our area of outstanding beauty, our natural environment and the peace and quiet we appreciate living here. Our finances will be decimated when impacts on tourism and crofting activities hit the island. The B&B room will no longer bring an income, crofting activities will be impacted and we have concerns for the health of our livestock. Wildlife, flora and fauna, marine and birdlife will change forever to the detriment of islanders and visitors alike. Industrialising this landscape and seascape will do untold damage to this special area and our dark skies and outstanding auroras will be lost forever. The impact on this special cultural community will be devastating and the after effects will damage this place and its inhabitants forever. Personally this is a price to much to pay. To loose our income and financial security with no benefit but the cost of our livelihoods and health, our culture, our heritage, our community all severely impacted is too much to ask of anyone let alone inflict on a fragile economy and ecosystem.

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: 6AB19534

Member of the public 1433

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are significant and cannot be overlooked. A major concern is the reliance on a flexible Project Design Envelope that lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and undermines the assessment's integrity, leading to a situation where the presented impacts may not accurately represent the eventual development. As a result, the public and the competent authority are unable to grasp the true environmental effects of the proposal.

Furthermore, the application places a heavy emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be mitigated later is unacceptable and does not allow for a meaningful evaluation of effectiveness or an assessment of any residual impacts. This postponement of essential information until post-consent stages contradicts the very purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly established before any determination is made.

Additionally, there are considerable evidential deficiencies present, including gaps in baseline data and limitations in the employed methodology, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, especially where conclusions indicating negligible or non-significant effects are drawn without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot align with statutory requirements.

The application fails to meet the evidential threshold set by the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly in relation to protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant 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, putting the competent authority in a position where it cannot make a well-informed determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment regime. Rather than offering a well-structured and reasoned evaluation of realistic alternatives based on their environmental effects, it merely outlines a narrative of the project's evolution. This method does not convincingly show that less harmful options

have been adequately identified, assessed, and selected over more damaging alternatives.

There is a clear lack of transparent, evidence-based comparisons among alternative offshore locations, development scales, or design configurations. Notably, the application does not provide evidence that the developer has earnestly considered placing turbines further offshore, where the visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in evaluating impact, the absence of such an analysis hinders any conclusion regarding whether the proposed siting truly represents the least damaging option.

These deficiencies are also evident in the assessments related to cable routing and landfall, where insufficient evidence has been provided to show that alternative routes have been thoroughly explored in order to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that the approach to mitigation has not been designed effectively, relying instead on post-design measures.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, impeding the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal meets the criteria for sustainability or aligns with policy requirements.

From a policy standpoint, these shortcomings compromise adherence to the National Planning Framework 4, particularly concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The lack of a structured, comparative assessment represents a material omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to provide a reliable assessment of marine ecology and protected species, particularly within the highly sensitive West Lewis coastal environment. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidence to evaluate potential impacts accurately.

A notable gap is found in the assessment of otters, a European Protected Species, where the application does not appropriately acknowledge their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range

and behavioural patterns leaves the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This undermines any conclusions suggesting no significant effects on the otter population.

In addition, the assessment of basking sharks is flawed due to its reliance on aerial surveys, which are subject to substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence compared to established land-based observations, which indicate frequent use of these waters. The omission of such relevant data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Without adequate baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not adhere to the Environmental Impact Assessment regime or National Planning Framework 4 standards, as there has been a failure to properly identify and assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Thus, under these circumstances, consent cannot be granted lawfully.

Overall, the lack of complete baseline data, flawed methodologies, and unsupported conclusions collectively undermine the assessment's reliability. These issues obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application is founded on insufficient evidence.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal presents serious flaws that critically undermine its conclusions. It is evident that the west coast of the Isle of Lewis is home to seabird populations of international significance, many of which are already experiencing decline. However, the application does not meet the necessary evidential standard to ensure that these species will not suffer adverse effects. The placement of the turbines within key foraging areas and migratory routes has not been thoroughly examined in relation to the risks of displacement, collision, or habitat loss.

A glaring contradiction is apparent in the application. The developer asserts that there will be no significant adverse effects, yet simultaneously presents a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment and suggests that the conclusions drawn lack appropriate evidential backing.

Moreover, the assessment fails to provide sufficient evidence that seabird species

linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is inadequately acknowledged, and the reliance on modelling techniques introduces considerable uncertainty. This is particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality rates, especially where baseline data is lacking and behavioural responses have not been fully accounted for.

The location of turbines along a recognised migratory corridor poses a further significant risk, as it creates an obstruction in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and inhibits a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological flaws, and a lack of compelling evidence. These weaknesses inhibit a thorough evaluation of the potential impacts and lead to the overall conclusion that the application does not satisfy the statutory criteria essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is profoundly insufficient, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interwoven. The application reduces heritage to mere isolated assets, failing to recognise their dynamic 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 sites for burial and spiritual practice, yet they are mischaracterised as static features in the assessment, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This inadequate portrayal leads to a flawed evaluation of cultural effects, ignoring their vital role in community life.

Additionally, the assessment does not take into account intangible cultural heritage elements, including the Gaelic language, traditions, and the deep-rooted relationship between the community and its coastal environment. These aspects are crucial to the area's identity yet are entirely excluded from consideration, marking a significant shortfall. Without evaluating these factors, the cultural ramifications of the development remain unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that meets the recognised characteristics of 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 of participation in matters affecting cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings position the proposal in stark contradiction to National Planning Framework 4, especially concerning the safeguarding of historic assets and places. Ignoring both tangible and intangible heritage and failing to recognise living cultural practices signifies a significant deviation from policy requirements.

In summary, the shortcomings in assessing living heritage, intangible cultural values, community rights, and legal obligations create a considerable evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing associated with the proposal have not been adequately assessed, resulting in a significant lack of transparency essential for a lawful evaluation. The developer has conducted a Social Impact Assessment, which included focus groups with local residents; however, the absence of the full report creates an evidential gap that hinders both public understanding and the competent authority's ability to assess the social risks highlighted in the developer's own research.

Residents have already reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, with these impacts grounded in direct engagement rather than speculation. Nonetheless, the failure to release the complete assessment limits scrutiny of the findings and impedes the determination of their significance in the decision-making process.

Furthermore, the proposal is viewed by some as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite the identification of these impacts, they have not been adequately incorporated into the main application or given the necessary weight. The decision to withhold the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community are at stake. By not providing the complete dataset, the application does not furnish a comprehensive evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application fails to comply with the National Planning Framework 4 concerning health and wellbeing, which mandates that development should foster positive health outcomes and avoid harm. The evidence available suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

The procedural ramifications are significant, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material shortcoming within the application and violates the evidential standards set forth in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of pre-existing adverse impacts, results in an incomplete and unreliable assessment. This undermines the potential for a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is lacking and does not adequately reflect the significant changes that would occur or the sensitivity of the environment involved. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering the area's character and causing a permanent and irreversible transformation of the landscape.

The application does not fully represent the extent of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This situation would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the level of impact or its significance concerning this sensitive landscape.

Methodological concerns also arise from the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This could mean that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Another critical deficiency is the failure to examine the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and altering their relationship with the natural horizon. This change represents not just a visual impact but also broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change does not align with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any claims of policy compliance.

Furthermore, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, making them unable to be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to properly assess construction and pollution risks, resulting in an incomplete evaluation of likely environmental effects. It entails significant seabed preparation and installation work in a challenging Atlantic environment, yet fails to provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on undefined mitigation and contingency measures that are set to be developed post-consent, which restricts the ability to meaningfully evaluate their effectiveness or adequacy.

This approach raises serious concerns, particularly due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and

crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not adequately address how these incidents will be prevented, controlled, or monitored.

There is considerable uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to the potential consequences for marine species and habitats that have already been identified as vulnerable within the wider assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution events. This creates procedural risks and undermines the authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in implementing essential environmental safeguards contravenes the Environmental Impact Assessment requirements. It is imperative that likely significant effects and mitigation are evaluated prior to consent; any deficiencies in this information prevent a lawful determination. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts leads to a materially deficient assessment. These significant shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application concerning the development off the West Lewis coast reveals significant deficiencies in its assessment of fisheries and marine life, which undermines its reliability. The ecological evaluation does not adequately address the diverse marine ecosystem present in these waters, nor does it consider the active fishing industry. The failure to demonstrate how these vital uses and habitats can be protected or maintained without substantial disruption is concerning.

A notable flaw in the proposal is the assumption that fishing activities can be displaced without adverse effects. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This absence of information is critical, as the potential for overfishing in different areas could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions 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 anticipated high-energy hammer piling over a prolonged period is expected to disturb a wide area, affecting species like dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without adequate supporting evidence.

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various pressures such as habitat disturbance, noise, and displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings prevent an accurate evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal suffers from a significant deficiency in the assessment of onshore infrastructure, failing to account for the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated separately, resulting in a disjointed approach that masks the true magnitude of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and is an ecologically significant habitat. The current application lacks a thorough assessment of these impacts, thus obstructing a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the evaluation of onshore impacts, the application undermines the potential for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively; nevertheless, the distinction between offshore and onshore elements obscures the comprehensive understanding of their combined effects on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, highlighting a notable evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide proof that requisite consents or procedures have been initiated, raising doubts about the feasibility and lawful execution of the project.

From a policy standpoint, the failure to conduct a holistic assessment of the project and to ensure the protection of peatlands, habitats, and land use interests stands in contradiction to the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further diminishes the reliability of the application.

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this application incomplete and untrustworthy, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive “wall of light” across the western horizon, fundamentally altering the night-time environment. This transformation represents a significant concern as the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. Given the importance of dark skies for the area's identity and the growth of emerging sectors like astro-tourism, this omission is noteworthy.

Moreover, the application neglects to evaluate the potential impacts on nocturnal wildlife, a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, leading to disorientation and increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the proposal fails to consider how the aviation lighting may affect these species or

contribute to higher mortality rates.

This lack of evaluation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of disorientation due to artificial lighting, yet this danger remains unassessed. The failure to collect site-specific night-time data leaves a critical gap in understanding the ecological impacts involved.

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

From a policy standpoint, the lack of assessment contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. This also undermines the wider assessment of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

Overall, the absence of any analysis regarding dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific examination renders the application incomplete and incapable of supporting 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 fails to meet the standards of sustainable development as mandated by statutory duties and national policy. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address these concerns adequately.

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

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

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

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

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

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

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: 9DAB0E68

Member of the public 1434

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are significant and cannot be overlooked. A major concern is the reliance on a flexible Project Design Envelope that lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and undermines the assessment's integrity, leading to a situation where the presented impacts may not accurately represent the eventual development. As a result, the public and the competent authority are unable to grasp the true environmental effects of the proposal.

Furthermore, the application places a heavy emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be mitigated later is unacceptable and does not allow for a meaningful evaluation of effectiveness or an assessment of any residual impacts. This postponement of essential information until post-consent stages contradicts the very purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly established before any determination is made.

Additionally, there are considerable evidential deficiencies present, including gaps in baseline data and limitations in the employed methodology, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, especially where conclusions indicating negligible or non-significant effects are drawn without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot align with statutory requirements.

The application fails to meet the evidential threshold set by the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly in relation to protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant 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, putting the competent authority in a position where it cannot make a well-informed determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment regime. Rather than offering a well-structured and reasoned evaluation of realistic alternatives based on their environmental effects, it merely outlines a narrative of the project's evolution. This method does not convincingly show that less harmful options

have been adequately identified, assessed, and selected over more damaging alternatives.

There is a clear lack of transparent, evidence-based comparisons among alternative offshore locations, development scales, or design configurations. Notably, the application does not provide evidence that the developer has earnestly considered placing turbines further offshore, where the visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in evaluating impact, the absence of such an analysis hinders any conclusion regarding whether the proposed siting truly represents the least damaging option.

These deficiencies are also evident in the assessments related to cable routing and landfall, where insufficient evidence has been provided to show that alternative routes have been thoroughly explored in order to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that the approach to mitigation has not been designed effectively, relying instead on post-design measures.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, impeding the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal meets the criteria for sustainability or aligns with policy requirements.

From a policy standpoint, these shortcomings compromise adherence to the National Planning Framework 4, particularly concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The lack of a structured, comparative assessment represents a material omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

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The application fails to provide a reliable assessment of marine ecology and protected species, particularly within the highly sensitive West Lewis coastal environment. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidence to evaluate potential impacts accurately.

A notable gap is found in the assessment of otters, a European Protected Species, where the application does not appropriately acknowledge their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range

and behavioural patterns leaves the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This undermines any conclusions suggesting no significant effects on the otter population.

In addition, the assessment of basking sharks is flawed due to its reliance on aerial surveys, which are subject to substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence compared to established land-based observations, which indicate frequent use of these waters. The omission of such relevant data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Without adequate baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not adhere to the Environmental Impact Assessment regime or National Planning Framework 4 standards, as there has been a failure to properly identify and assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Thus, under these circumstances, consent cannot be granted lawfully.

Overall, the lack of complete baseline data, flawed methodologies, and unsupported conclusions collectively undermine the assessment's reliability. These issues obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application is founded on insufficient evidence.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal presents serious flaws that critically undermine its conclusions. It is evident that the west coast of the Isle of Lewis is home to seabird populations of international significance, many of which are already experiencing decline. However, the application does not meet the necessary evidential standard to ensure that these species will not suffer adverse effects. The placement of the turbines within key foraging areas and migratory routes has not been thoroughly examined in relation to the risks of displacement, collision, or habitat loss.

A glaring contradiction is apparent in the application. The developer asserts that there will be no significant adverse effects, yet simultaneously presents a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment and suggests that the conclusions drawn lack appropriate evidential backing.

Moreover, the assessment fails to provide sufficient evidence that seabird species

linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is inadequately acknowledged, and the reliance on modelling techniques introduces considerable uncertainty. This is particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality rates, especially where baseline data is lacking and behavioural responses have not been fully accounted for.

The location of turbines along a recognised migratory corridor poses a further significant risk, as it creates an obstruction in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and inhibits a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological flaws, and a lack of compelling evidence. These weaknesses inhibit a thorough evaluation of the potential impacts and lead to the overall conclusion that the application does not satisfy the statutory criteria essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is profoundly insufficient, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interwoven. The application reduces heritage to mere isolated assets, failing to recognise their dynamic 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 sites for burial and spiritual practice, yet they are mischaracterised as static features in the assessment, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This inadequate portrayal leads to a flawed evaluation of cultural effects, ignoring their vital role in community life.

Additionally, the assessment does not take into account intangible cultural heritage elements, including the Gaelic language, traditions, and the deep-rooted relationship between the community and its coastal environment. These aspects are crucial to the area's identity yet are entirely excluded from consideration, marking a significant shortfall. Without evaluating these factors, the cultural ramifications of the development remain unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that meets the recognised characteristics of 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 of participation in matters affecting cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings position the proposal in stark contradiction to National Planning Framework 4, especially concerning the safeguarding of historic assets and places. Ignoring both tangible and intangible heritage and failing to recognise living cultural practices signifies a significant deviation from policy requirements.

In summary, the shortcomings in assessing living heritage, intangible cultural values, community rights, and legal obligations create a considerable evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing associated with the proposal have not been adequately assessed, resulting in a significant lack of transparency essential for a lawful evaluation. The developer has conducted a Social Impact Assessment, which included focus groups with local residents; however, the absence of the full report creates an evidential gap that hinders both public understanding and the competent authority's ability to assess the social risks highlighted in the developer's own research.

Residents have already reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, with these impacts grounded in direct engagement rather than speculation. Nonetheless, the failure to release the complete assessment limits scrutiny of the findings and impedes the determination of their significance in the decision-making process.

Furthermore, the proposal is viewed by some as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite the identification of these impacts, they have not been adequately incorporated into the main application or given the necessary weight. The decision to withhold the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community are at stake. By not providing the complete dataset, the application does not furnish a comprehensive evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application fails to comply with the National Planning Framework 4 concerning health and wellbeing, which mandates that development should foster positive health outcomes and avoid harm. The evidence available suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

The procedural ramifications are significant, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material shortcoming within the application and violates the evidential standards set forth in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of pre-existing adverse impacts, results in an incomplete and unreliable assessment. This undermines the potential for a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is lacking and does not adequately reflect the significant changes that would occur or the sensitivity of the environment involved. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering the area's character and causing a permanent and irreversible transformation of the landscape.

The application does not fully represent the extent of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This situation would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the level of impact or its significance concerning this sensitive landscape.

Methodological concerns also arise from the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This could mean that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Another critical deficiency is the failure to examine the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and altering their relationship with the natural horizon. This change represents not just a visual impact but also broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change does not align with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any claims of policy compliance.

Furthermore, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, making them unable to be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to properly assess construction and pollution risks, resulting in an incomplete evaluation of likely environmental effects. It entails significant seabed preparation and installation work in a challenging Atlantic environment, yet fails to provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on undefined mitigation and contingency measures that are set to be developed post-consent, which restricts the ability to meaningfully evaluate their effectiveness or adequacy.

This approach raises serious concerns, particularly due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and

crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not adequately address how these incidents will be prevented, controlled, or monitored.

There is considerable uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to the potential consequences for marine species and habitats that have already been identified as vulnerable within the wider assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution events. This creates procedural risks and undermines the authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in implementing essential environmental safeguards contravenes the Environmental Impact Assessment requirements. It is imperative that likely significant effects and mitigation are evaluated prior to consent; any deficiencies in this information prevent a lawful determination. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts leads to a materially deficient assessment. These significant shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application concerning the development off the West Lewis coast reveals significant deficiencies in its assessment of fisheries and marine life, which undermines its reliability. The ecological evaluation does not adequately address the diverse marine ecosystem present in these waters, nor does it consider the active fishing industry. The failure to demonstrate how these vital uses and habitats can be protected or maintained without substantial disruption is concerning.

A notable flaw in the proposal is the assumption that fishing activities can be displaced without adverse effects. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This absence of information is critical, as the potential for overfishing in different areas could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions 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 anticipated high-energy hammer piling over a prolonged period is expected to disturb a wide area, affecting species like dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without adequate supporting evidence.

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various pressures such as habitat disturbance, noise, and displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings prevent an accurate evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal suffers from a significant deficiency in the assessment of onshore infrastructure, failing to account for the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated separately, resulting in a disjointed approach that masks the true magnitude of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and is an ecologically significant habitat. The current application lacks a thorough assessment of these impacts, thus obstructing a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the evaluation of onshore impacts, the application undermines the potential for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively; nevertheless, the distinction between offshore and onshore elements obscures the comprehensive understanding of their combined effects on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, highlighting a notable evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide proof that requisite consents or procedures have been initiated, raising doubts about the feasibility and lawful execution of the project.

From a policy standpoint, the failure to conduct a holistic assessment of the project and to ensure the protection of peatlands, habitats, and land use interests stands in contradiction to the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further diminishes the reliability of the application.

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this application incomplete and untrustworthy, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive “wall of light” across the western horizon, fundamentally altering the night-time environment. This transformation represents a significant concern as the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. Given the importance of dark skies for the area's identity and the growth of emerging sectors like astro-tourism, this omission is noteworthy.

Moreover, the application neglects to evaluate the potential impacts on nocturnal wildlife, a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, leading to disorientation and increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the proposal fails to consider how the aviation lighting may affect these species or

contribute to higher mortality rates.

This lack of evaluation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of disorientation due to artificial lighting, yet this danger remains unassessed. The failure to collect site-specific night-time data leaves a critical gap in understanding the ecological impacts involved.

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

From a policy standpoint, the lack of assessment contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. This also undermines the wider assessment of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

Overall, the absence of any analysis regarding dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific examination renders the application incomplete and incapable of supporting 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 fails to meet the standards of sustainable development as mandated by statutory duties and national policy. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address these concerns adequately.

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

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

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

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

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

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

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: 9DAB0E68

Member of the public 1435

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

Dear Sir/Madam

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

A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals that the application does not provide an adequate evidential basis for lawful determination. Key environmental data is absent, baseline information appears limited and inconsistent, and several critical aspects of the proposal are not clearly defined. The use of a flexible design framework hampers understanding of likely significant effects, and reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation fails to facilitate a complete or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, there are distinct and substantive conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests required for consent and weaken the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, involving large turbines situated in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The proposed development application lacks a thorough assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic alternatives that consider environmental effects, instead offering a narrative account of the project's evolution. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

Furthermore, there is a significant absence of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has thoughtfully considered the option of positioning turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline, the crucial importance of proximity to the shore in determining impact, and the lack of analysis in this area hinder the ability to conclude that the proposed site represents the least damaging option.

This inadequacy also extends to the evaluation of cable routing and landfall, where there is insufficient evidence showing that alternative routes have been thoroughly explored to minimise impacts on sensitive receptors, including areas of cultural and spiritual importance such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis reveal a failure to apply mitigation by design, resulting in a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been effectively minimised through site selection, layout, and infrastructure routing. This oversight signifies a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a rigorous assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a critical omission that contributes to the overall conclusion that the application has not undergone adequate scrutiny and cannot support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal presented fails to adequately assess cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape that intricately links environment, language, tradition, and community. The assessment adopts an overly simplistic view, treating heritage as a collection of separate, static assets instead of recognising their continuing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are addressed. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use and meaning, as well as the potential impacts of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural implications and disregards the sites' importance in community life.

The intangible aspects of cultural heritage are also not considered, with the assessment omitting critical elements like the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These factors are vital to the area's identity, yet their exclusion signifies a major oversight. Without addressing these elements, the cultural impact of the development remains inadequately assessed.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of genuine engagement calls into question the credibility of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

Furthermore, a significant procedural error arises from the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without such an assessment, the relevant authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This oversight alone renders a lawful determination impossible.

From a policy standpoint, the deficiencies in the application are at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear breach of policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and essential statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, and the application does not provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation. This omission is not merely procedural; it restricts the evidential framework required for assessing the proposal’s impact comprehensively. Without access to the complete

dataset, the application falls short of meeting the evidential standards established under the Environmental Impact Assessment regime.

Moreover, there is a troubling lack of transparency regarding social impacts, health, and wellbeing associated with the development. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, preventing both the public and the relevant authorities from grasping the full extent of social risks highlighted in the developer's research.

Available summaries reveal that residents are already experiencing notable stress, anxiety, and concern due to the size and proximity of the proposed development. These impacts are based on direct engagement, thereby affirming their validity rather than relying on speculation. Yet, the failure to release the comprehensive assessment stifles proper scrutiny of these findings and diminishes the capacity to assess their relevance in the decision-making process.

The perception of the proposal as a threat to community identity and cohesion is also evident, with "cultural loss" identified in the developer's own findings. However, these serious impacts have not been adequately considered in the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs tied to this development, thus failing to integrate these critical factors into the overall evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Effective development must foster positive health outcomes while minimising harm. Nevertheless, the existing adverse effects highlighted by the available evidence have not been fully acknowledged. Consequently, without the complete assessment, it cannot be substantiated that the application aligns with this policy.

In summary, the failure to disclose the full Social Impact Assessment, coupled with the evidence of already experienced adverse impacts, renders the evaluation both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to support its approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline threatens to create a continuous industrial presence that would fundamentally change this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not accurately represent the extent of visual change that would occur. The scale and proximity of the turbines are such that they would dominate views

from residential areas, historic sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact within the context of such a sensitive environment.

Methodological issues are also evident in the selection and presentation of visual viewpoints. It appears that the viewpoints included may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the concern that the magnitude of visual impact has been understated, thereby compromising the reliability of the assessment.

Moreover, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, form part of a larger landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This represents not merely a visual impact but also a broader cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 in terms of safeguarding natural places and historic assets. The magnitude of change proposed is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

Collectively, these deficiencies in the assessment prevent an accurate representation of the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. This reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in the assessment of construction and pollution risks, leading to an incomplete evaluation of potential environmental effects. It involves extensive seabed preparation and installation activities in a high-energy

Atlantic environment, yet lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application suggests relying on future mitigation and contingency measures, which will be established after consent is granted. This approach hinders any meaningful assessment of their adequacy or effectiveness prior to approval.

The sensitivity of the receiving environment amplifies the issues associated with this reliance on undefined future measures. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies. 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, the extent, duration, or ecological impacts of these plumes cannot be determined, raising further concerns for sensitive marine species and habitats identified in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination. From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated before consent, and the lack of this information means a lawful determination cannot be achieved.

Ultimately, the combined absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

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

understood.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is expected to disturb a wide area, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The examination of onshore infrastructure is significantly lacking and does not adequately account for the comprehensive impacts stemming from what constitutes a singular, integrated project. The connection between offshore turbines and onshore works is critical, yet these elements are evaluated in isolation. This fragmented assessment clouds the true magnitude of the environmental and socio-economic ramifications.

Onshore activities encompass cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through delicate landscapes. These undertakings necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is not only a vital carbon sink but also an ecologically sensitive area. The application fails to deliver a thorough assessment of

these impacts, hindering a complete understanding of the project's overall environmental footprint.

The omission or postponement of onshore impact evaluations obstructs an accurate appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered in conjunction. However, the distinct treatment of offshore and onshore components obscures the collective impacts on peatlands, habitats, and local communities, leaving these critical aspects inadequately understood.

Moreover, there are significant threats to vulnerable habitats, such as machair systems and peatland environments, which hold policy protection. The application does not convincingly demonstrate that the consequences for these habitats have been thoroughly evaluated or that suitable avoidance strategies have been enacted. This results in a notable evidential void concerning biodiversity preservation.

Concerns regarding carbon balance are also prominent. Disturbance of peatland results in the release of stored carbon, which may instigate a carbon debt, undermining the very objectives of renewable energy initiatives. The application lacks sufficient analysis of this matter or fails to show that the overall carbon balance is favourable.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with current land use and legal rights. There is no evidence provided that the requisite consents or procedures have been initiated, leading to doubts about the feasibility and lawful execution of the proposal.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate safeguarding of peatlands, habitats, and land use concerns is at odds with the National Marine Plan and National Planning Framework 4. The inability to prove that adverse impacts can be avoided or mitigated further diminishes the application's credibility.

Ultimately, the disjointed treatment of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a serious gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which can be seen from long distances, would create an intrusive and continuous "wall of light" across the western horizon, thereby fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given that dark skies contribute significantly to the area's identity and to the growth of tourism sectors such as astro-tourism. The absence of this analysis leads to a notable deficiency in the overall landscape and environmental assessment.

Additionally, there is no consideration of the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and a higher risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, failing to investigate how aviation lighting could impact these species or potentially raise mortality rates.

This issue is further complicated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal behaviours or risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data creates a significant void in understanding the ecological impacts.

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

From a policy standpoint, these omissions contradict the National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. They also undermine the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall ecosystem.

In conclusion, the absence of an assessment of dark skies and nocturnal wildlife creates a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The assessment of tourism impacts is insufficient and does not address the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide any quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen considerable growth, increasing from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and deterioration of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without such an analysis, it is impossible to ascertain whether the development would offer a net economic benefit or harm an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

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

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

Overall, the inability to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hinders a thorough assessment of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. The application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

There are significant gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further complicates matters, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to the absence of tourism impact modelling. Additionally, the cumulative impact of offshore and onshore components has not been properly assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

Collectively, these issues render the application procedurally and substantively unfit for determination. The significant information deficiencies, combined with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the missing information.

In light of these factors, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

As I am from the islands and grown up here our landscapes and the places we live are of huge importance and need protection.

I am in favour of wind energy and renewals but not at the cost to our island shores and additional impacts it will have.

We also pay high tariffs for electricity and there is tariff benefits to the island communities for these turbines.

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: A30FBD9A

Member of the public 1436

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 a detailed examination of the Environmental Impact Assessment Report and associated documents, pinpointing critical deficiencies across planning, environmental, cultural, and procedural dimensions. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely untouched environment, and rich cultural heritage. Concerns are raised about the scale, proximity, and design of the proposed development, which challenge its alignment with statutory obligations, national policy directives, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful assessment. It omits crucial environmental data, presents limited and inconsistent baseline information, and leaves significant components of the proposal undefined. The implementation of a flexible design framework obscures the assessment of likely significant effects, and the dependence on unarticulated mitigation measures hampers any evaluation of their potential effectiveness. Consequently, the information provided fails to facilitate a comprehensive understanding of the environmental, cultural, or community repercussions, and assertions of negligible or insignificant impacts lack robust supporting evidence.

Furthermore, clear and considerable policy discrepancies have emerged. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national standards for biodiversity protection, climate considerations, and environmental integrity. These inconsistencies relate directly to the statutory tests necessary for consent and jeopardise the ability of the relevant authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of this proposal raises additional concerns, as large turbines are set to be positioned in close proximity to the shoreline, provoking substantial issues regarding landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, weaknesses in evidence, and evident non-compliance with policy guidelines indicate that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, it is imperative that the precautionary principle be enforced.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to provide a reliable assessment of marine ecology and protected species, particularly within the highly sensitive West Lewis coastal environment. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidence to evaluate potential impacts accurately.

A notable gap is found in the assessment of otters, a European Protected Species, where the application does not appropriately acknowledge their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leaves the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This undermines any conclusions suggesting no significant effects on the otter population.

In addition, the assessment of basking sharks is flawed due to its reliance on aerial surveys, which are subject to substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence compared to established land-based observations, which indicate frequent use of these waters. The omission of such relevant data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Without adequate baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not adhere to the Environmental Impact Assessment regime or National Planning Framework 4 standards, as there has been a failure to properly identify and assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Thus, under these circumstances, consent cannot be granted lawfully.

Overall, the lack of complete baseline data, flawed methodologies, and unsupported conclusions collectively undermine the assessment's reliability. These issues obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application is founded on insufficient evidence.

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 cultural heritage assessment is fundamentally flawed and does not acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. The application simplifies heritage, treating it as a collection of isolated, unchanging assets instead of recognising

their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is found in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet the assessment regards them merely as static features, neglecting their continued usage, significance, and the development's impact on their context. This misrepresentation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Moreover, the application fails to evaluate intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are crucial to the area's identity, yet they are entirely overlooked in the assessment, creating a major gap. Without taking these aspects into account, the cultural implications of the proposed development cannot be accurately assessed.

There are also serious issues concerning community rights and engagement. The Gaelic-speaking population has a distinctive cultural identity, recognised as an Indigenous People, but there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and disregards established principles for participation in decisions that affect cultural and environmental matters.

A critical procedural oversight 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 meet its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these deficiencies put the proposal in direct contradiction with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, along with failing to acknowledge living cultural practices, signifies a clear deviation from policy standards.

Overall, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory requirements create a significant evidential gap. The true cultural impacts of the proposed development have not been thoroughly examined, and the application does not offer a robust foundation for understanding the real cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment represents a critical gap in the evaluation of social impacts, health, and wellbeing associated with the proposed development. Despite the developer's efforts to engage local residents through focus groups, the lack of transparency regarding the complete findings hinders both public

understanding and the competent authority's ability to assess the implications of the developer's own research.

Summaries available suggest that residents are already experiencing heightened levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct feedback from the community and should not be dismissed as speculative. However, without access to the full assessment, the findings cannot be properly scrutinised, limiting their significance in the decision-making process.

Moreover, there is a clear perception among the community that the proposal threatens their identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Regrettably, these critical impacts have not been adequately addressed within the main application, nor have they been given the weight they deserve. The failure to disclose the complete Social Impact Assessment obscures the true social and human costs of this development.

This deficiency in transparency undermines the integrity of the Environmental Impact Assessment process. To fully understand the social, economic, and health impacts of such a significant proposal, it is essential to consider the effects on community character and functioning. The omission of the full dataset leaves the application without a comprehensive evidential foundation, complicating the assessment of the balance between potential benefits and harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence points to existing adverse effects that remain undisclosed. Without the complete assessment, it is impossible to demonstrate adherence to this policy.

The implications of these procedural shortcomings are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material deficiency within the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the overall assessment incomplete and unreliable. This situation obstructs a lawful determination and underscores the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, landscape, and seascape impacts is significantly lacking and does not sufficiently address the scale of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an unobstructed Atlantic horizon, an undeveloped nature, and a pronounced sense of

remoteness. The proposal to install large-scale turbines in close proximity to the shore would establish a continuous and prominent industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application inadequately conveys the extent of the visual changes that would occur. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would detrimentally affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment fails to adequately express the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that the viewpoints chosen may not represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and landscapes of high value. This raises the possibility that the scale of visual impact has been downplayed, which undermines the credibility of the assessment.

Moreover, there is a significant shortcoming in the assessment's failure to analyse the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, resulting in a deficient evaluation of their impact and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are appreciated and breaking their connection to the natural horizon. This represents not only a visual concern but also a deeper cultural and spatial detriment that the application has not sufficiently addressed.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The extent of change proposed is incompatible with the imperative to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case analysis further challenges any assertions of policy conformity.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be prominent and inescapable. Thus, the resulting changes are fundamentally permanent, rather than reducible to an acceptable level through mitigation measures.

In summary, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not aligned with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and important habitats, which are particularly vulnerable to contamination and sediment disturbance. The proposal includes significant seabed preparation and installation activities within a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

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

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

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information prevents a lawful determination. The application also does not adequately demonstrate compliance with the policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The overall assessment of the proposal is fundamentally flawed due to numerous deficiencies that undermine its credibility. A significant concern is the failure to adequately evaluate the socio-economic impacts on the active fishing industry and the

diverse marine ecosystem off the West Lewis coast. The application does not provide evidence that alternative fishing grounds can accommodate any displacement resulting from the proposed activities. This raises critical questions regarding the sustainability of local fisheries, as the potential for overfishing in other areas poses wider economic risks for the local fleet.

Furthermore, the assessment underestimates the impact of underwater noise, particularly from high-energy hammer piling, which is anticipated to disrupt marine life over extensive areas. The concerns surrounding the disturbance to the local bottlenose dolphin population are serious, yet the application downplays these effects, lacking sufficient evidence to justify this stance. There is a troubling contradiction within the application itself; while it acknowledges the necessity of licenses to allow for harm to European Protected Species, it simultaneously claims that the anticipated impacts are negligible. This inconsistency calls into question compliance with the Habitats Regulations and the overall integrity of the assessment process.

Moreover, the assessment does not take into account the cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined factors, it is impossible to ascertain the full effects on marine ecosystems and the socio-economic conditions that depend on them.

From a policy perspective, 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 existing marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of evidence regarding fishing displacement, coupled with the underestimation of acoustic impacts and the internal inconsistencies present, ultimately renders the assessment incomplete and unreliable. Thus, a robust evaluation of the impacts on marine life and fisheries remains unachievable.

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.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is markedly deficient in its evaluation of nocturnal wildlife and dark skies, which constitutes a significant omission. The coastline of West Lewis is noted for its exceptionally dark skies, integral to both environmental quality and cultural identity, as well as being a draw for tourism. The proposal intends to install permanent red aviation lighting that would be observable over considerable distances, thereby creating a persistent and intrusive "wall of light" across the western horizon, fundamentally altering the nocturnal environment.

There is no assessment of how this lighting would impact visual amenity, landscape character, or the experiences of local residents and visitors. Such an oversight is particularly significant in light of the role that dark skies play in the area's identity and the burgeoning sector of astro-tourism. This lack of consideration introduces a clear deficiency in the comprehensive landscape and environmental evaluation.

More importantly, the proposal fails to include an evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially susceptible to artificial lighting due to their phototactic responses, which can cause disorientation and raise the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, resulting in an inadequate evaluation of how aviation lighting may affect these species or contribute to increased mortality.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately address nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this potential hazard has not been examined. The absence of data specific to night-time conditions creates a crucial gap in the understanding of ecological impacts.

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

From a policy standpoint, these omissions contradict the guidelines set forth in the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Moreover, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecological framework.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analyses render the application incomplete and inadequate for a lawful decision-making process.

TOURISM

The assessment of tourism impacts associated with the application is significantly inadequate, failing to address the economic and social repercussions for a vital sector within the Isle of Lewis economy. It is critical to acknowledge that tourism relies heavily on the region's wild coastline, almost untouched landscapes, dark skies, and a prevailing sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it neglects to provide a quantified evaluation regarding how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nonetheless, the application does not adequately model

the potential impacts on Tourism Gross Value Added or the broader economic resilience stemming from the industrialisation of the seascape and a decline in environmental quality. Without such a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or pose a threat to an established and expanding sector.

Furthermore, the assessment disregards the critical role of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences, alongside emerging markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable void in understanding the effects on a recognised and evolving segment of the local economy.

Given that the island community has limited economic diversification, the lack of an impact assessment on tourism holds broader implications for employment, local enterprises, and community sustainability. The failure to produce a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate a net benefit. It also stands in contradiction to strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the collective failure to quantify the impacts of tourism, evaluate environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This shortcoming obstructs a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties and national policy. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the level of industrialisation. This new application, presented under a more robust policy framework, still falls short, particularly in areas concerning biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the proposal is incomplete and unreliable. There are substantial gaps in baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Furthermore, vital impact pathways have been omitted, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is not comprehensive and fails to provide a clear understanding of the likely significant effects

or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which contravenes statutory obligations under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a serious gap that hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

The proposal also contradicts National Planning Framework 4, as it does not adequately demonstrate protection for biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, particularly due to the lack of tourism impact analysis. The assessment of cumulative impacts from both offshore and onshore components is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The industrialisation of the Atlantic-facing coastline would lead to substantial and irreversible changes to a highly sensitive landscape. Effects such as the loss of dark skies, disruption of cultural and visual connections, and negative impacts on tourism are permanent alterations that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The combination of informational deficiencies, policy inconsistencies, and unresolved environmental risks makes it impossible to arrive at a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent based on these grounds or utilises the appropriate regulatory measures to compel 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.

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: 400AC67A

Member of the public 1437

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or dependable account of the expected environmental consequences of the proposal. A flexible Project Design Envelope is employed without firm commitments to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and hinders the consistent application of a worst-case scenario. Such a lack of clarity compromises the assessment's integrity and obscures the true extent of the environmental impacts, preventing both the public and the competent authority from fully grasping the potential effects of the development.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought based on the premise that environmental harm will be mitigated in the future, which obstructs a meaningful evaluation of the effectiveness of these measures and assessment of any residual impacts. This postponement of essential information to post-consent stages is procedurally improper and contradicts the intention of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly defined prior to decision-making.

The report also suffers from critical evidential shortcomings, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty surrounding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. This lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory obligations.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to the National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are established.

Collectively, the dependence on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of presenting a transparent analysis based on environmental effects, it offers a narrative account of project development. This

omission indicates that the identification, assessment, and selection of less harmful options in preference to more damaging solutions have not been adequately conducted.

Furthermore, there is a notable lack of evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the possibility of placing turbines further offshore has been seriously evaluated, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the significance of proximity to the shore in assessing impact, underscores the importance of this analysis. Without it, one cannot conclude that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with the lack of comparative analysis, suggests that mitigation by design has not been applied, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been effectively minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to assess whether more appropriate and less harmful alternatives exist. The lack of a robust alternatives assessment ultimately raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated, rendering it incapable of supporting a lawful determination.

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 assessment of the proposal is fundamentally flawed, exhibiting substantial gaps in evidence and inconsistencies that undermine its conclusions. Key foraging areas and migratory pathways, particularly along the west coast of the Isle of Lewis, support internationally important seabird populations, many of which are already experiencing declines. However, the application fails to demonstrate, to the necessary evidential standard, that these species will not be adversely affected by the development. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a significant contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence

presented.

Moreover, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, particularly given the incomplete baseline data and a lack of comprehensive understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents additional significant risks, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion that would support consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development lacks adequate consideration of the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are interwoven. This application adopts an overly simplistic view, treating heritage merely as isolated assets rather than recognising their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the evaluation of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the assessment

provides an incomplete picture of the cultural implications, disregarding the cemeteries' vital role in community life.

Moreover, the evaluation fails to address intangible cultural heritage elements, such as the Gaelic language and traditions, along with the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are conspicuously missing from the assessment, representing a serious oversight. Without acknowledging these factors, the development's cultural impact remains inadequately understood.

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

A significant procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to examine the social, cultural, and economic effects on the island community, rendering any determination unlawful.

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

In summary, the failure to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the proposed development have not been properly assessed, leaving the application without a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Current summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, gathered

through direct engagement, are factual rather than speculative. However, the failure to disclose the complete assessment hinders appropriate scrutiny and limits the assessment of the significance of these impacts within the decision-making framework.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented in the application is fundamentally flawed, failing to accurately represent the seascape, landscape, and visual impacts associated with the proposed development. The West Lewis coastline is characterised by its unspoilt Atlantic horizon and a significant sense of remoteness. The introduction of large-scale turbines near the shoreline would disrupt this character, resulting in a permanent and irreversible alteration to the landscape.

This application does not fully capture the extent of visual change that would occur. Given their scale and proximity, the turbines would overwhelm views from residential areas, historic sites, and popular coastal locations. This would undermine visual

amenity and diminish the qualities of naturalness and remoteness that define this sensitive environment. The assessment fails to convey the significance of these impacts adequately, thus misrepresenting the true extent of the threat posed.

Methodological issues also arise regarding the selection of visual viewpoints, which may not effectively represent the most sensitive receptors or worst-case scenarios, particularly concerning vital cultural heritage sites and high-value landscapes. This risk of understating the visual impact significantly compromises the assessment's reliability.

Additionally, the relationship between landscape, seascape, and cultural heritage is not properly evaluated. Significant 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 heritage assets as isolated entities, neglecting their interdependence and thus failing to adequately assess impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these vital connections, altering the context in which heritage assets are experienced and severing their links to the natural horizon. This effect represents not just a visual impact but a wider cultural and spatial harm that the application does not sufficiently address.

From a policy standpoint, this proposal contravenes National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed change does not align with the need to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a robust worst-case assessment further undermines any claims of compliance with policy requirements.

It is evident that the identified impacts are not capable of effective mitigation. The scale, height, and proximity of the turbines would ensure their dominant presence, making the resulting changes fundamental and permanent rather than manageable through mitigation measures.

Overall, the assessment fails to adequately represent the magnitude of 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 necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

Instead, it relies on mitigation and contingency measures that are to be prepared post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline is known for its clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures further exacerbates these issues. By deferring contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are in place to respond to pollution events, introducing procedural risk that hinders the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be made. The application also fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts lead to a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate that these habitats and uses can be preserved or maintained without substantial disruption.

A critical concern arises from the assumption that fishing activities can be displaced

without adverse effects. The application lacks evidence regarding the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional pressure that displacement would entail. This gap is crucial, as it presents the risk of overfishing in other areas, with potential adverse economic ramifications for the local fishing fleet. In the absence of a detailed and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise resulting from construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to cause disturbances across extensive areas, which would impact species such as dolphins. Concerns regarding the predicted disturbance to a significant proportion of the local bottlenose dolphin population are serious, yet the application minimises the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, acknowledging the requirement for licences to permit harm to European Protected Species while simultaneously characterising such impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is anticipated to necessitate legal authorisation.

Furthermore, the assessment fails to address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, 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 does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with current marine users or avoid significant negative impacts on marine biodiversity, thereby undermining the conclusion that this proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The failure to assess the project as a whole raises significant concerns regarding the impacts on land use and legal rights. The routing of infrastructure through active croft land introduces potential conflicts, and the application lacks evidence that necessary consents or processes have been initiated. This absence of documentation leads to questions about the deliverability and lawful implementation of the project.

Furthermore, the assessment of onshore infrastructure is materially incomplete, which obscures the true scale of environmental and socio-economic effects. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately, resulting in a fragmented approach that fails to consider the cumulative effects of the project. By excluding or deferring the assessment of onshore impacts, a proper evaluation of cumulative effects on peatlands, habitats, and communities cannot be achieved.

The onshore elements involve construction activities such as cabling across protected moorland and the establishment of a substation near Stornoway. These works require excavation across deep peat areas, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, preventing a full understanding of the project's overall environmental footprint.

There are also considerable risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, creating a clear evidential gap regarding biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The application does not adequately address this issue or demonstrate that the overall carbon balance remains beneficial.

From a policy perspective, the separation of project components and the inability to demonstrate protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated undermines the application and highlights its incompleteness and unreliability, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly overlooks the assessment of nocturnal wildlife and dark skies, which represents a critical gap in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, an essential aspect of environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible over extensive distances, would create a continuous and intrusive "wall of light" effect that would drastically change the night-time environment.

Furthermore, there is a notable lack of evaluation regarding the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This omission is particularly concerning, given the significance of dark skies to the region's identity and the growth of emerging sectors such as astro-tourism. The absence of consideration for these impacts leads to a substantial deficiency in the

overall landscape and environmental assessment.

Equally alarming is the failure to assess the effects on nocturnal wildlife. Species including the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, resulting in disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study in the application fails to address how the proposed aviation lighting could affect these species or raise mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects to account for nocturnal activity and related dangers. Kittiwakes, for instance, are known to forage and migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a vital shortcoming in the understanding of ecological impacts.

In the absence of a nocturnal impact assessment, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and impeding a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural places and the quality of the environment. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time forms a crucial component of the environment.

Overall, the complete lack of assessment concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application insufficient and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts associated with the application is significantly inadequate, failing to address the economic and social repercussions for a vital sector within the Isle of Lewis economy. It is critical to acknowledge that tourism relies heavily on the region's wild coastline, almost untouched landscapes, dark skies, and a prevailing sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it neglects to provide a quantified evaluation regarding how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nonetheless, the application does not adequately model the potential impacts on Tourism Gross Value Added or the broader economic

resilience stemming from the industrialisation of the seascape and a decline in environmental quality. Without such a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or pose a threat to an established and expanding sector.

Furthermore, the assessment disregards the critical role of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences, alongside emerging markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable void in understanding the effects on a recognised and evolving segment of the local economy.

Given that the island community has limited economic diversification, the lack of an impact assessment on tourism holds broader implications for employment, local enterprises, and community sustainability. The failure to produce a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate a net benefit. It also stands in contradiction to strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the collective failure to quantify the impacts of tourism, evaluate environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This shortcoming obstructs a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

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

There are substantial deficiencies in the evidential basis for this application. It lacks complete and reliable baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Furthermore, key impact pathways, such as those relating to nocturnal wildlife, onshore infrastructure, and tourism effects, have not been addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant

effects or residual impacts.

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

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

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

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

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

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

Additional Comments

The proposed wind farm will spoil the stunning landscape, and will affect marine life

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: 09B6FF58

Member of the public 1438

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

Dear Sir/Madam

This representation serves as a formal objection to the 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 an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of the potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There are also evident and substantial conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests needed for consent and weaken the capacity of the competent authority to determine the proposal's acceptability in policy terms.

Moreover, the scale of the project is unprecedented for this area, with large turbines situated in close proximity to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and overall environmental consequences. When considered together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and pronounced policy non-compliance highlight that the application is incomplete and cannot support a lawful determination. Therefore, under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate. It does not offer a clear or trustworthy account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes and layouts, creates considerable uncertainty. This uncertainty hinders a consistent worst-case scenario application and undermines the assessment's integrity. As a result, the potential impacts presented may not accurately reflect the final development, limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

The application depends significantly on mitigation measures and management plans that remain undefined. Seeking consent based on the promise to address environmental harm later prevents a thorough evaluation of these measures' effectiveness and the assessment of any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's aim, which is to establish significant effects and mitigation clearly before any determination is made.

There are serious evidential shortcomings, including insufficient baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty about the scale and significance of impacts. Conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of comprehensive information obscures understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been thoroughly assessed or that suitable 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 both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental effects, meaning that the competent authority cannot properly determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the project's evolution. This narrative does not demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has considered placing turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis undermines any claim that the proposed siting represents the least damaging option.

The deficiencies are also evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual importance such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, with reliance instead on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy obstructs the competent authority from determining whether more appropriate and less harmful alternatives are available. Without a robust alternatives assessment, it cannot be concluded that the proposal aligns with sustainable or policy-compliant solutions.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate assessment and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to offer an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is insufficient. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species, compromising the assessment's ability to evaluate potential impacts reliably.

A significant shortcoming is the treatment of otters, classified as a European Protected Species. The application neglects to fully acknowledge and assess their active usage of coastal regions for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, means that the possible effects of construction disturbances, such as noise and increased human activity, have not been adequately evaluated. Consequently, the conclusions drawn about the absence of significant effects on otters are undermined.

Moreover, the assessment of basking sharks is flawed, with reliance on aerial surveys

leading to considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that suggest frequent usage of these waters. The failure to integrate or properly consider this data results in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hampers the ability to assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment framework or National Planning Framework 4, as it has not adequately identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects with reasonable scientific certainty, thereby invoking the precautionary principle. Under these circumstances, granting consent is not legally permissible.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, thereby revealing that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant flaws, revealing substantial gaps in evidence and inconsistencies that challenge its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately prove that these species will not be negatively impacted. It is situated in crucial foraging areas and migratory routes, yet the assessment inadequately considers the risks of displacement, collision, or habitat loss.

There is a notable contradiction in the application: the developer claims there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack support from the underlying evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding areas is not thoroughly addressed, and the reliance on modelling introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

The proposed location of turbines within a recognised migratory corridor raises further

concerns, as it could create a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term effects of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory claims, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hampers a lawful conclusion supporting consent. Moreover, the identified deficiencies indicate a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

Overall, the assessment is deemed unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of the potential impacts and contribute to the conclusion that the application does not fulfill the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is not merely a geographical area; it embodies a living cultural landscape where environment, language, tradition, and community interlink deeply. The assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a series of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community. This reductive approach fails to acknowledge the integral nature of these cultural elements.

A significant shortcoming is evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features. This oversight neglects their continuous use and meaning, resulting in an incomplete understanding of the cultural effects and disregarding their significance within community life.

The application also neglects to assess intangible cultural heritage, including the Gaelic language and traditions that form the foundation of community identity in the area. This omission is notable as these elements are vital to understanding the cultural impact of the development. Without their inclusion, the assessment remains deficient and fails to capture the true cultural cost of the proposed development.

Additionally, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised as having the characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the

assessment and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, a significant procedural failure exists due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy perspective, these deficiencies place the proposal at odds 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 a disregard for living cultural practices, signifies a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a sufficient basis for evaluating the genuine cultural implications of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included engagement with local residents through focus groups. However, the full report has not been published, leading to a significant evidential gap that hinders public understanding and the competent authority's ability to assess social risks identified in the developer’s research. Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative, yet without the full assessment, there is limited capacity for proper scrutiny of these findings, making it difficult to ascertain their significance in the decision-making process.

Moreover, the development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this recognition, such impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is vital for developments of this nature, especially when they may affect community character and functioning. The failure to provide the full dataset results in an application that lacks a comprehensive evidential basis to weigh the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development

proposals must foster positive health outcomes and mitigate harm; however, existing adverse effects have not been fully disclosed. Without access to the complete assessment, demonstrating compliance with this policy is impossible. The procedural implications are profound, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission signifies a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable, which ultimately obstructs a lawful determination and supports the view that the application lacks sufficient information.

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 assessment of construction and pollution risks is inadequate, lacking the detail necessary to evaluate potential environmental effects. The proposal entails considerable seabed preparation and installation works in a high-energy Atlantic environment. However, the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful evaluation of their effectiveness or sufficiency.

This reliance on unspecified future measures is especially troubling given the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate information on how these risks will be prevented, controlled, or monitored.

There is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to 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 intensifies these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are in place to address pollution incidents. This introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant

effects and mitigation need to be evaluated prior to granting consent, and if this information is absent, 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, the absence 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 and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not establish that

the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby failing to confirm that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately consider the full range of impacts associated with what constitutes a single integrated project. While the offshore turbines and onshore works are interconnected, they are evaluated separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic consequences.

The onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By excluding or postponing an assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the distinct treatment of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and communities are inadequately understood.

There are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not establish that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been employed, indicating a significant evidential gap concerning biodiversity protection.

Additionally, the project raises serious concerns related to carbon balance. The disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or show that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to assess the project as a cohesive 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 prove that impacts can be avoided or mitigated further weakens the application.

Overall, the separation of project elements, lack of comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment concerning dark skies and nocturnal wildlife represents a significant omission in the Environmental Impact Assessment. The West Lewis coastline features exceptionally dark skies, which are vital to the environmental quality, cultural identity, and tourism value of the area. The proposed project includes permanent red aviation lighting that will be visible over considerable distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon, which would fundamentally alter the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experience of both residents and visitors. This is particularly concerning given the critical role that dark skies play in the area's identity and the burgeoning sector of astro-tourism. The absence of such evaluations reveals a significant gap in the overall landscape and environmental assessment.

Equally important is the lack of analysis regarding the impacts on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are especially sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased risks of collision. The application does not contain a lighting impact assessment or a phototaxis study, thus neglecting to consider how aviation lighting could impact these species or heighten mortality rates.

This deficiency is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or related risks. Species such as Kittiwakes, which may engage in foraging or migration at night, are also at risk of disorientation from artificial lighting; however, this risk remains unassessed. The absence of site-specific data related to night-time activity creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning

Framework 4, particularly regarding the protection of natural places and environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral element of the overall environment.

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

TOURISM

The assessment of tourism impacts in the application is inadequate and overlooks the economic and social effects on a vital part of the Isle of Lewis economy. Tourism is heavily reliant on the island's natural features, such as its wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no analysis provided to quantify how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution from tourism.

The economic significance of tourism is notable, with growth from £65 million in 2017 to over £81.5 million, alongside the support of more than 1,000 jobs, representing up to 16% of the island's economy. However, the application fails to forecast the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this evaluation, it remains unclear if the development would yield a net economic advantage or disrupt a well-established and expanding sector.

Additionally, the assessment does not address the significance of environmental quality for tourism. This includes the crucial role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a critical gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a community like this island, which has limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means that these economic risks have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy viewpoint, the application does not meet the standards of the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It is at odds with strategic goals that recognise tourism as a priority growth area and fails to provide enough evidence for the competent authority to evaluate the economic effects of the proposal.

In conclusion, the combination of the lack of quantification of tourism impacts, the failure to assess the environmental factors influencing visitor behaviour, and the oversight of the island's economic reliance on tourism leads to a significant evidential gap. This gap hinders a thorough assessment of the economic repercussions and indicates that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant shortfall in meeting sustainable development criteria when evaluated against statutory obligations, national policy, and evidential requirements. It echoes the principal concerns that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Presenting the application under a more stringent policy framework, it fails to adequately address issues such as biodiversity, peatland safeguarding, landscape preservation, and community wellbeing.

There is a notable absence of a complete and reliable evidential basis for consideration of this application. Gaps in baseline data are critical, compounded by the continued reliance on an unspecified design envelope and mitigation measures that lack detail. Furthermore, key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have not been addressed. As a result, the Environmental Impact Assessment is incomplete, inhibiting a comprehensive understanding of potential significant effects and residual impacts.

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

In direct contradiction to National Planning Framework 4, the proposal fails to protect biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact analysis. The failure to properly assess the cumulative impact of both offshore and onshore components obscures the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially considerable. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and preventing a lawful determination that impacts are acceptable.

The proposal would lead to significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies,

disruption of cultural and visual relationships, and negative effects on tourism represent permanent changes that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The combination of substantial information deficiencies, conflicts with policy, and unresolved environmental risks inhibits a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or utilise the relevant regulatory mechanisms to require the submission of the outstanding information.

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

Additional Comments

As someone born and bred from the Isle of Lewis, these proposals for wind turbines on our shores is not going to benefit anyone on the island. It will forever ruin the coastline of our isles and the waters surrounding it. All of the industries which bring an income to the people, island and country will be affected as it will reduce tourism to the isles, disrupt the peace and tranquility of the the island, for which it is well known. Marine life will be disrupted and will have a detrimental impact for the economy system which in turn will ruin the fishing around the isles. Please consider another option. Visit the islands for yourselves and see the beauty, tranquility and history of our island and see what it is like and how it will be forever damaged if it was to go ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1C162297

Member of the public 1439

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. However, the scale and design of the proposal are unprecedented for this location and raise significant concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and the associated documentation has revealed material planning, environmental, cultural, and procedural deficiencies. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the adoption of a flexible design framework hinders a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures raises additional concerns, as their effectiveness cannot currently be assessed. Consequently, the documentation fails to provide a complete or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not backed by robust evidence.

There exist clear and substantial conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and challenge the competent authority's ability to determine the development's acceptability from a policy standpoint.

Given the proposal's significant scale and the positioning of large turbines in close proximity to the shoreline, concerns surrounding landscape capacity, visual dominance, and overall environmental impact are heightened. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability needed to fully account for the potential environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, results in considerable uncertainty. This uncertainty compromises the integrity of the assessment, meaning that the impacts detailed may not accurately represent the development that will ultimately be constructed. As a result, both the public and the competent authority are unable to grasp the true extent of the environmental effects.

The application relies on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the understanding that environmental harm will be addressed later prevents a proper evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to stages after consent is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before a determination is made.

Moreover, there are considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions in lieu of site-specific evidence. Such issues result in uncertainty surrounding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal also fails to comply with the National Planning Framework 4, especially in terms of biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that proper safeguards are established.

In summary, the dependence on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and robust evaluation of environmental effects, preventing the competent authority from making a well-informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development suffers from a materially inadequate assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned comparison of realistic alternatives based on environmental effects, the application offers a narrative of the project's evolution. This method does not demonstrate that less harmful options

have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a distinct lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not indicate that the developer has genuinely explored the possibility of placing turbines further offshore, where the potential for reduced visual, ecological, and coastal impacts would exist. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in determining impact, the absence of such analysis precludes any assertion that the proposed siting is the least damaging option available.

The inadequacies further extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis point to a failure to apply mitigation by design, resulting in a reliance on post-design mitigation measures instead.

Consequently, the application does not 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 and inhibits the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, 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.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to satisfy the evidential threshold necessary to establish no adverse effect on the integrity of protected sites. This deficiency is underscored by the presence of contradictory conclusions, coupled with significant gaps in data and limitations inherent in the modelling approaches utilised. As a result, the standard of beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and hindering a lawful conclusion in support of consent.

The ornithological assessment is fundamentally flawed, exhibiting substantial gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. Yet, the application fails to meet the required evidential standard demonstrating that these species will not face adverse effects. Key foraging areas and migratory pathways are situated within the proposed development, yet the assessment neglects to thoroughly evaluate the potential implications of displacement, collision risk, or habitat loss.

There exists a critical contradiction within the application, whereby the developer asserts there will be no significant adverse effects while simultaneously pursuing a

Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment lacks adequate evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars that are in critical decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are inadequately understood.

The placement of turbines within a recognised migratory corridor presents an additional and considerable risk, effectively establishing a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or consider the potential impact on species with relatively small global populations.

The identified deficiencies also reflect a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological inadequacies, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of the impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application does not adequately assess cultural heritage and community identity, particularly 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 treats heritage as isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual practice, yet the assessment categorises them as static features, overlooking their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the role these sites play in community life.

Furthermore, the application neglects to assess intangible cultural heritage elements, including the Gaelic language, traditions, and the long-standing relationship between

the community and the coastal environment. These aspects are vital to the area's identity but are completely missing from the assessment, constituting a significant omission. Without addressing these factors, the cultural impact of the development cannot be fully understood.

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

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

From a policy standpoint, the deficiencies in the application conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the lack of recognition of living cultural practices indicate a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is concerning and significantly undermines the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This omission creates a notable evidential gap, hindering both public understanding and the competent authority's ability to gauge the full extent of the social risks that have been identified.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are therefore grounded in reality, not conjecture. The absence of the complete assessment limits scrutiny of these findings and restricts the ability to understand their implications for decision-making.

Furthermore, there are indications that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer’s findings. Nonetheless, these significant impacts have not been adequately incorporated into the

main application or given the appropriate consideration they deserve. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of comprehensive information also compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, particularly when community character and functionality are at stake. Without the complete dataset, the application lacks a full evidential basis necessary for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that remain undisclosed. In light of the incomplete assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture 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 raises significant concerns due to the incomplete assessment of construction and pollution risks, failing to provide the necessary detail to fully evaluate likely environmental effects. With substantial seabed preparation and installation works planned in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application's reliance on mitigation and contingency measures that are to be prepared post-consent effectively thwarts any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly troubling given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

Additionally, 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 effects of such impacts. This uncertainty also extends to the 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 further exacerbates these issues. By postponing contingency planning until after consent, the application undermines the opportunity for evaluating whether the necessary safeguards are in place to adequately respond to pollution events. This procedural risk complicates the assessment by the competent authority concerning environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and necessary mitigation be assessed prior to consent; without such information, a lawful determination cannot occur. Furthermore, 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 surrounding potential impacts culminate in a materially deficient assessment. These significant shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across large areas, notably impacting local populations of dolphins. The potential disturbance to a considerable segment of the bottlenose dolphin population is a major concern; however, the application fails to adequately address the severity of these effects and lacks sufficient supporting evidence.

In addition to the risks to marine species, the application inadequately assesses the implications for fisheries and marine life, providing a poor evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a

vibrant marine ecosystem and a vital fishing industry, yet the application does not demonstrate how these habitats and uses can be preserved or maintained without causing significant disruption.

A crucial flaw in the application is the assumption that fishing activities can be relocated without any negative consequences. The proposal lacks evidence to confirm that alternative fishing grounds are available and viable for supporting the additional pressure from displaced activities. This significant omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the assessment fails to adequately address cumulative impacts that may arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The inability to evaluate these combined effects inhibits a full understanding of the overall impact on marine ecosystems and socio-economic conditions.

The application also shows a notable inconsistency regarding the need for licenses to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

From a policy standpoint, the application does not prove compliance with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of substantiated evidence concerning fishing displacement, the minimisation of acoustic impacts, and the inconsistencies throughout the assessment render it incomplete and unreliable. These shortcomings hinder the ability to conduct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is fundamentally flawed, failing to capture the full scope of the impacts associated with what constitutes a single integrated project. The linkage between the offshore turbines and the onshore works is crucial; however, they are evaluated in isolation. This fragmented approach obscures the true environmental and socio-economic consequences of the project.

Onshore elements entail significant interventions, including cabling through protected moorland, the construction of a substation close to Stornoway, and necessary access infrastructure across sensitive landscapes. Such construction involves excavation in areas of deep peat, notably within Barvas Moor, a vital carbon store and ecologically

sensitive habitat. The lack of a thorough assessment of these impacts precludes a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts or deferring this evaluation, the application inhibits an accurate appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined collectively. However, by treating offshore and onshore elements separately, the combined impacts on habitats, peatlands, and local communities remain inadequately understood.

There are considerable risks posed to sensitive habitats such as machair systems and peatland environments, which are protected under existing policies. The application fails to adequately demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, leaving a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises critical issues regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently address this matter or show that the overall carbon balance is still beneficial.

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

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

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 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, leading to a continuous and intrusive "wall of light" effect across the western horizon. This development fundamentally alters the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. Dark skies are essential to the area's environmental quality, cultural identity, and tourism value.

Crucially, there has been no assessment of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. The omission is particularly concerning given the rising significance of dark skies to local identity and

the burgeoning tourism sectors such as astro-tourism. The lack of consideration for these impacts reveals a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting because of phototaxis, which can result in disorientation and an increased risk of collision. The application lacks a lighting impact assessment or a phototaxis study, failing to evaluate how the aviation lighting may adversely affect these species or contribute to mortality rates.

This oversight is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which neglects to account for nocturnal activities and related risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

Moreover, from a policy perspective, these omissions contradict the National Planning Framework 4 concerning the protection of natural places and environmental quality. This gap also undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a vital component of the overall ecosystem.

In summary, the failure to assess dark skies and nocturnal wildlife creates a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot lawfully support a determination.

TOURISM

The proposal for large-scale offshore infrastructure lacks a comprehensive assessment of its tourism impacts, which is essential given the importance of this sector to the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to quantify how the proposed developments would influence visitor numbers, behaviour, or their overall economic contribution.

Tourism on the Isle of Lewis has seen significant growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the proposal does not analyse how the

industrialisation of the seascape and potential decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the area. Without such an analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment neglects the significance of environmental quality in enhancing the tourism experience, especially regarding the preservation of unspoiled landscapes and dark skies. This oversight is especially critical for emerging sectors 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 potential impacts on this growing aspect of the local economy.

In an island community characterised by limited economic diversification, the neglect of tourism impact assessments holds broader implications for employment, local enterprises, and the sustainability of the community. The absence of an appropriate Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated in line with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly concerning economic impacts and the necessity to illustrate net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the economic dependencies of the island culminate in a significant evidential gap. This inadequacy hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm embodies a critical shortfall in fulfilling the principles of sustainable development as mandated by statutory duties and national policy. This application echoes the fundamental issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, it is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

The evidential basis provided in the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope persists. There is an overreliance on unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are overlooked. Consequently, the Environmental Impact Assessment remains unfinished, hindering a comprehensive understanding of significant effects and

residual impacts.

Moreover, clear procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while failing to disclose a full Social Impact Assessment constitutes a serious omission. These failings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct contradiction to National Planning Framework 4, as it does not demonstrate the necessary protection for biodiversity, natural spaces, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful determination 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, the loss of dark skies, the disruption of cultural and visual relationships, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In conclusion, the application is procedurally and substantively unsuitable for determination. The multitude of information gaps, in conjunction with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or activate the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

I have stayed on the Isle of Lewis and I know what an exceptional and largely unspoiled environment, community, culture it holds. In particular it has unique land and surrounding marine environments with associated ecosystems, wildlife and scenery, historic remains set within vast landscapes that are world class and of global importance that should never be destroyed by the industrialisation of the land or sea. Tourism, a vital part of the economy, will be affected. I for one will not return to see

such ruination of what is so precious and unique . We should be protecting such places, not destroying them irrevocably. The marine life will be affected drastically. Sea birds are slaughtered or displaced. The ultra sound generated will represent a health hazard to the people who live there. People will have their hearts broken by witnessing such devastation. It is an abomination that the Scottish Government would consider approving such a devastatingly awful, destructive industrial structure in such a stunning place that ought to have every possible protection to preserve what is beautiful, unique, special and worthy of the highest protection possible. This is the wrong place for this sort of power production. If the government approves this then they have sold their country and heritage for mere money and it could never be regained.

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: 419357AF

Member of the public 1440

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

Dear Sir/Madam

This letter is a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and supporting documents, highlighting material deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. It contains missing critical environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal are not clearly defined. The flexible design framework inhibits a clear understanding of likely significant effects, while unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not backed by robust evidence.

There are clear policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, with large turbines positioned near the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that undermine its reliability and transparency regarding the environmental effects of the proposal. A significant concern arises from the application of a flexible Project

Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This ambiguity leads to considerable uncertainty and hampers the ability to apply a worst-case scenario consistently, thus compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent those of the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental effects.

Furthermore, the application is heavily contingent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. By seeking consent on the premise that any potential environmental harm will be rectified later, the assessment fails to provide a meaningful evaluation of these measures' effectiveness or an accurate appraisal of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly established before making a determination.

Moreover, the report suffers from substantial evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This raises doubts about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly concerning 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 strategies, and the presence of significant gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and robust evaluation of the environmental effects, meaning that the competent authority is not adequately positioned to assess the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application does not satisfy the statutory requirements of the Environmental Impact Assessment regime, particularly with regard to the assessment of alternatives. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it presents a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options

have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a significant lack of transparent and evidence-based comparison concerning alternative offshore locations, development scales, or design configurations. Specifically, the application fails to show that the developer has considered the potential of locating 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 environmental impact, the failure to conduct such analysis means that it cannot be concluded that the proposed siting is the least damaging option available.

Further deficiencies are evident in the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise 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 suggest that there has been no application of mitigation by design, which has led to a reliance on post-design mitigation measures instead.

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

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally inadequate, failing to deliver a thorough and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically rich marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species, leading to an assessment that does not offer a credible evidential basis for evaluating potential impacts.

Particularly concerning is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge or

assess their active utilisation of coastal areas for both foraging and movement. Consequently, this oversight results in a lack of analysis concerning their core foraging range and behavioural patterns. The potential impacts from construction disturbance, noise, and increased activity have therefore not been thoroughly evaluated, undermining any assertions made about the absence of significant effects on this species.

Additionally, the assessment of basking sharks presents further shortcomings, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such data culminates in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

Given these methodological shortcomings, conclusions stating negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or assess protected species. The degree of uncertainty generated precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, the lawful granting of consent is not achievable.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a comprehensive evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents numerous deficiencies that fundamentally undermine its reliability. There are significant gaps in evidence and inconsistencies within the findings that call into question the conclusions drawn. The location of the development within crucial foraging areas and migratory pathways for seabirds, particularly on the west coast of the Isle of Lewis, raises concerns, especially given that these populations are already experiencing decline. The application fails to adequately demonstrate that these internationally important species will not face adverse effects, particularly in light of potential habitat loss, displacement, and collision risks.

A critical contradiction arises from the developer's assertion of no significant adverse effects, while simultaneously submitting a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the validity of the assessment, indicating that the conclusions are not underpinned by sufficient evidence. Furthermore, there is a lack of robust evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The essential feeding grounds for these birds have not been fully acknowledged, and the reliance on modelling methods introduces considerable uncertainty, especially for species experiencing severe decline, like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, particularly when baseline data is incomplete and the behavioural responses of species are not comprehensively understood.

Moreover, the placement of turbines within a known migratory corridor adds an additional layer of risk. This development effectively creates a barrier within a primary flight path that is critical for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently explore the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory standards are also not met, as the application fails to provide the necessary evidential threshold to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, data gaps, and modelling shortcomings indicates that the standard of beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and thereby hindering a lawful conclusion in favour of consent.

Overall, these identified shortcomings reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected positions the proposal at odds with national policy. Collectively, these factors render the assessment unreliable, as the internal inconsistencies, methodological flaws, and insufficient evidence hinder a thorough evaluation of potential impacts and contribute to the conclusion that the application does not fulfil the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic viewpoint, treating heritage as isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites

of burial and spiritual practice; however, the assessment erroneously categorises them as static features, ignoring their continued relevance and the implications of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural impacts and overlooks their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, which encompasses the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are fundamental to the identity of the area but are entirely omitted from the assessment, representing a significant oversight. Without acknowledging these elements, it is impossible to fully comprehend the cultural implications of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, recognised as having characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been conducted. This lack of meaningful engagement undermines the legitimacy of the assessment and neglects to reflect established principles regarding participation in decisions that impact cultural and environmental interests.

A critical procedural deficiency 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 effects on the island community. This omission alone renders a lawful determination unachievable.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and sites. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sufficient foundation for understanding the true cultural cost of 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 assessment of visual, seascape, and landscape impacts is significantly flawed and does not adequately capture the extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unobstructed Atlantic horizon, natural state, and pronounced sense of isolation. The proposed installation of large-scale turbines in close proximity to the coast would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a lasting and irrevocable alteration of the landscape.

Moreover, the application inadequately conveys the scale of this visual transformation. The turbines would overshadow views from residential locations, historical sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately reflect this level of impact or its significance, particularly within the context of such a delicate landscape.

There are also serious methodological issues concerning the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints might not effectively capture the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, thereby compromising the assessment's reliability.

Additionally, the assessment fails to consider 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, interlinked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these sites in isolation rather than recognising their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The anticipated scale of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case evaluation further weakens any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks raises significant concerns regarding the potential environmental effects of the proposal. The project

necessitates extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans limits the ability to evaluate the proposed mitigation and contingency measures, which are deferred until after consent is granted. This reliance on future, undefined measures is particularly alarming given the sensitivity of the receiving environment.

The West Lewis coastline, known for its clean coastal waters and vital habitats, is susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures. Moreover, the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation further complicates the assessment. Without rigorous modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This approach introduces procedural risks and undermines the capacity 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 strategies must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements related 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 culminate in a materially deficient assessment. These inadequacies hinder a thorough evaluation of construction and pollution risks, supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of thorough assessment regarding fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast, which support a diverse marine ecosystem and a vital fishing industry, are not adequately considered in terms of protection or maintenance from significant disruption.

A critical problem lies in the assumption that fishing activities can be displaced without

any repercussions. The application offers no evidence supporting the availability or accessibility of alternative fishing grounds that could accommodate additional pressure. This notable omission carries substantial risk, as such displacement could lead to overfishing in other areas and may have far-reaching economic consequences for the local fishing fleet. The lack of a clear, evidence-based assessment obscures a proper understanding of the potential impacts on fisheries and livelihoods.

Moreover, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life across extensive distances, adversely affecting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is alarming; however, the application minimizes the importance of these effects, lacking sufficient supporting evidence.

There exists a troubling inconsistency within the application, wherein the necessity for licences to authorise harm to European Protected Species is acknowledged, while simultaneously stating that the anticipated impacts are negligible. This contradiction severely undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially in cases where anticipated harm would require legal authorisation.

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

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

Ultimately, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of the project, treating offshore turbines and onshore infrastructure as separate entities, which obscures the overall environmental and socio-economic impacts. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve significant excavation in areas of deep peat, particularly within Barvas Moor. This location serves as a vital carbon store and an ecologically sensitive

habitat. The assessment fails to provide a comprehensive analysis of the impacts associated with these activities, thereby limiting understanding of the project's complete environmental footprint.

By not addressing onshore impacts adequately, the application undermines the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined together; however, the distinct treatment of offshore and onshore elements results in an incomplete understanding of the combined effects on peatlands, local habitats, and surrounding communities.

Moreover, there are substantial risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application lacks evidence that these habitats' impacts have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance linked to the proposal. Disturbance to peatland has the potential to release stored carbon, which could lead to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this aspect or prove that the overall carbon balance is advantageous.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not demonstrate that necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

In summary, the disjointed evaluation of project components, the absence of a thorough assessment, and the lack of substantial evidence on environmental and land use impacts render this application incomplete and unreliable, obstructing a lawful determination.

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 proposal lacks a thorough assessment of tourism impacts, which is critical given its significance to the Isle of Lewis economy. Tourism relies heavily on the area’s wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the economic contribution of the sector.

In recent years, tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for

as much as 16% of the island's economy. Nevertheless, the application does not explore how the potential industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the resilience of the local economy. Without such analysis, it is impossible to ascertain whether this development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in attracting tourists, specifically the role of unspoiled landscapes and dark skies in enhancing visitor experiences and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the implications for a recognised and growing component of the local economy.

Given that the island community has limited economic diversification, the neglect to assess tourism impacts extends beyond this sector, affecting employment, local businesses, and the sustainability of the community. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in line with the requirements outlined in 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 a net benefit. It also contradicts strategic goals that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to appraise the economic ramifications of the proposal.

The collective failure to quantify tourism impacts, analyse the environmental factors influencing visitor behaviour, and address the island's economic reliance results in a significant evidential gap. This situation hampers a comprehensive evaluation of economic effects and reinforces the notion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed excessively industrial. Presenting this application within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the underlying deficiencies.

The evidential basis for the proposal is incomplete and unreliable. Critical gaps in baseline data are evident, as is the continued utilisation of an undefined design envelope. Furthermore, the reliance on unspecified mitigation measures and the omission of significant impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, contribute to an Environmental Impact

Assessment that is fundamentally inadequate. This lack of thoroughness hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are also apparent. The absence of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment constitutes a significant omission. Such deficiencies inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and there is a lack of evidence regarding net economic benefits, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals reveal inconsistencies. The evidential threshold required to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been satisfied, thereby engaging the precautionary principle and inhibiting lawful conclusions regarding acceptable impacts.

Additionally, the proposal would result in 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 impacts on tourism represent permanent changes that cannot be sufficiently mitigated.

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

Consequently, 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: 2D901BEB

Member of the public 1441

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

Dear Sir/Madam

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

Critical environmental data is notably absent, and there is a lack of adequate baseline information, which is both limited and inconsistent. Key aspects of the proposal remain undefined, compounded by the use of a flexible design framework that hinders a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures casts doubt on their potential effectiveness, leaving the documentation insufficient to provide a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

There are significant policy conflicts associated with this application. 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 proposal fails to demonstrate adherence to national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for granting consent and impede the competent authority's ability to deem the development acceptable in policy terms.

Furthermore, the unprecedented scale of the proposal raises alarming concerns regarding landscape capacity, visual dominance, and environmental impact, given the positioning of large turbines in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance suggests that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to provide a reliable understanding of the environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope,

which avoids committing to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty compromises the integrity of the assessment, rendering the presented impacts potentially unreflective of the actual development that may be constructed. As a result, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application is fundamentally flawed in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of presenting a structured and reasoned comparison of realistic alternatives based on environmental impacts, it offers merely a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the developer has not shown that locating turbines further offshore has been seriously considered, even though such a move could likely reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of this analysis undermines any claim that the proposed siting is the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been properly investigated 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 mitigation by design has not been considered, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through effective site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, thus hindering the competent authority's ability to determine whether less harmful and more suitable alternatives are available. The absence of a robust alternatives assessment raises serious doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, these shortcomings compromise 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 is a significant omission that contributes to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents significant deficiencies in the assessment of marine ecology and protected species, failing to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the methodologies employed are inadequate, with incomplete baseline data that does not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment does not furnish a sound evidential basis for evaluating potential impacts.

One major shortcoming is the assessment of otters, a European Protected Species, where their active use of coastal areas for foraging and movement has not been properly recognised or evaluated. The omission of their core foraging range and behavioural patterns means that potential effects from construction disturbance, noise, and increased activity have not been sufficiently assessed. This gap undermines the conclusions regarding the absence of significant effects on otters.

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

These methodological flaws lead to outcomes of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of adequate baseline data hampers any 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 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 properly identified or assessed protected species. The uncertainty that arises from these shortcomings precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking adequate evidence and containing significant internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not provide the necessary evidential assurance that these species will remain unaffected. The development is situated within crucial foraging areas and migratory routes, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly assessed.

A critical inconsistency arises within the application, where the developer asserts that 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. This contradiction undermines the credibility of the assessment and suggests that the conclusions reached are not adequately supported by the available evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding areas is not fully acknowledged, and reliance on modelling approaches introduces uncertainties, particularly for species like

Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the limitations of baseline data and the incomplete understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, significant risk by effectively creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of ongoing mortality within this corridor, nor does it consider the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful determination in favour of consent. The identified deficiencies also signify a non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively impacted places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These flaws impede a thorough evaluation of potential impacts and lead to the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is seriously lacking. It overlooks the West Lewis coastline as a vibrant cultural landscape where community, language, tradition, and environment are interconnected. The application reduces heritage to mere static assets and fails to recognise their ongoing social, cultural, and spiritual significance within the community.

Culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised. These sites serve as active places for burial and spiritual practice, yet they are treated as unchanging features. This oversight fails to take into account their continued use and the effects of development on their environment. As a result, the evaluation of cultural impacts is incomplete, neglecting their vital role in community life.

Moreover, the assessment does not address intangible cultural heritage. Key elements like the Gaelic language, traditions, and the community's enduring relationship with the coastal landscape are crucial to the area's identity but are notably absent from the assessment. This omission hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of engagement calls into question the validity of the assessment and ignores established principles of participation in matters affecting cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination unlawful.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially concerning the protection of historical assets and locations. Not considering both tangible and intangible heritage, and failing to acknowledge living cultural practices, represents a clear deviation from policy standards.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted lacks transparency and comprehensiveness. A Social Impact Assessment was commissioned by the developer, which included focus group discussions with local residents. However, the absence of the full report creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to assess the potential social risks identified through this research.

Available summaries suggest that the local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts arise from direct engagement with the community, indicating that they are based on actual experiences rather than speculation. Nevertheless, the failure to publish the complete assessment prevents a thorough examination of the findings and diminishes the capacity to evaluate their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to the community's identity and cohesion, with a "cultural loss" noted in the developer's own findings. Despite acknowledging these impacts, they have not been adequately incorporated into the main application or given appropriate consideration.

The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency further undermines the Environmental Impact Assessment process. An in-depth understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality are at stake. By failing to provide the complete dataset, the application does not present a thorough evidential foundation for weighing benefits against potential harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the evidence currently available indicates adverse effects that have not been fully acknowledged. Without the full assessment, demonstrating compliance with this policy is not feasible.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a significant gap within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies regarding the assessment of construction and pollution risks, failing to offer the necessary details for evaluating potential environmental effects. There is a substantial requirement for seabed preparation and installation works within a high-energy Atlantic environment, yet the application 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 developed after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures is especially alarming, given the sensitivity of the receiving environment along the West Lewis coastline. This area supports 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 supply enough detail on the methods to prevent, control, or monitor these incidents.

There remains considerable uncertainty regarding the scale and behaviour of sediment

plumes caused by seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures when making a determination.

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

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

FISHERIES AND MARINE LIFE

The proposal presents substantial risks to marine species, particularly due to the underwater noise generated during construction activities. High-energy hammer piling over a prolonged period is expected to cause disturbances over large distances, which could negatively affect species like dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is a major concern, yet the application minimises the significance of these effects without providing adequate supporting evidence.

Additionally, there is a clear contradiction within the application regarding the need for licences to permit harm to European Protected Species, while also describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when harm is anticipated to a level that would necessitate legal authorisation.

The assessment of fisheries and marine life is notably insufficient, lacking a robust evaluation of 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, yet the application fails to demonstrate how these habitats and uses can be protected

or maintained without significant disruption.

A critical concern is the assumption that fishing activities can be displaced without any consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of withstanding the additional pressure. This omission is particularly important, as displacement could lead to overfishing in other areas and might have wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and local livelihoods remain poorly understood.

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

From a policy standpoint, the application 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, hindering any conclusion that the proposal embodies sustainable development.

In summary, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These deficiencies obstruct a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

By neglecting to assess onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed assessment means that the combined impacts on peatlands, habitats, and local communities remain poorly understood.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

More alarmingly, there has been no evaluation regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risks. The

application lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or potentially increase mortality rates.

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

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

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

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

TOURISM

The application does not adequately assess the impacts on tourism, which is a vital part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore development could influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen substantial growth, increasing from £65 million in 2017 to more than £81.5 million. It supports over 1,000 jobs and makes up to 16% of the island's economy. Nevertheless, the application does not analyse how the industrialisation of the seascape and a decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience. This lack of analysis leaves unclear whether the development would provide a net economic advantage or harm an established and growing sector.

Additionally, the evaluation overlooks the significance of environmental quality in enhancing the tourism experience. The unspoiled landscapes and dark skies are critical to attracting visitors and emerging markets like nature-based tourism and astro-

tourism. The failure to conduct a Dark Skies Assessment creates a significant gap in understanding the impacts on this growing segment of the local economy.

In an island community where economic diversification is limited, not assessing tourism impacts also has broader consequences for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means these economic risks have not been evaluated as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the need to show net benefit. It contradicts strategic objectives that highlight tourism as a key growth sector and lacks sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application echoes the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this application under a stronger policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community welfare, does not mitigate these concerns.

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

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

The proposal is also at odds with National Planning Framework 4. It does not

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

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

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

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

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

Additional Comments

This proposal should be refused on the above grounds. I object to this wholeheartedly.

There are multiple and extensive reasons for refusal based on public help to risks, pollution in erection and maintenance and damage to local marine life both birds and marine life.

The extensic negative impact can not be ignored and the destruction of our coastlines and beautiful landscapes can not be undone impacting wider on tourism and attraction to these areas of historic beauty.

There has been no thorough assessment of alternatives to this proposal or a proper environmental impact study carried out. These comprehensive independent assessments (not just minimal tick box reviews) must be carried out and this proposal rejected as an interim measure until this data is fully available and been reviewed by government and the public.

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: 18106E9B

Member of the public 1442

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The application falls under the marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents reveals several significant deficiencies relating to planning, environmental impact, cultural considerations, 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 rich cultural identity.

The application lacks a solid evidential foundation for a lawful decision. Important environmental data is absent, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the project are not clearly defined. The use of a flexible design framework obscures the likely significant effects, while the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

There are evident conflicts with existing policies. The proposal seems to contradict 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. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine that the development aligns with policy objectives.

The scale of the proposed project is unprecedented for this area, with large turbines sited close to the shoreline, raising substantial issues related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy requirements indicate that the application is incomplete. It fails to support a lawful determination, and therefore, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient and fails to deliver a comprehensive, transparent, or reliable overview of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope,

lacking definitive commitments to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty hampers a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the projected impacts may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from grasping the true scale of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. As such, consent is sought with the understanding that any environmental harm will be addressed subsequently. This approach obstructs a meaningful evaluation of the effectiveness of these measures and an assessment of residual impacts. Deferring key information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigation be clearly established before any determination is made.

Moreover, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are offered without robust supporting data. The lack of adequate information inhibits a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it is not evidenced that impacts have been fully assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and the existing gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies hinder a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives fundamentally undermines compliance with the statutory requirements of the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of realistic alternatives based on environmental effects, instead offering a narrative account of the project's evolution. This method does not adequately illustrate that less

harmful options have been identified, assessed, and chosen over more damaging solutions.

In terms of alternative offshore locations, development scales, or design configurations, the application lacks a transparent or evidence-based comparison. Notably, it does not show that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be significantly reduced. The sensitive nature of the West Lewis coastline and the critical role of proximity to shore in determining impact highlight the shortcomings of the analysis, making it impossible to conclude that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation through design has not been adequately employed, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This shortfall indicates a failure to adhere to the established mitigation hierarchy, leaving the competent authority unable to ascertain whether there are less harmful and more suitable alternatives. In the absence of a robust alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to provide a complete and reliable understanding of the ecological receptors in this sensitive and biologically active area. Inadequate baseline data and poor methodologies result in an inability to accurately capture species presence, behaviour, and habitat use, leading to a lack of evidential support for evaluating potential impacts.

Among the critical shortcomings is the omission of otters, which are a European Protected Species. The application neglects to properly identify and assess their active use of coastal zones for foraging and movement. This oversight means that the

assessment does not consider their core foraging range and behavioural patterns, resulting in an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity on this species. Consequently, the conclusions drawn regarding the absence of significant effects are undermined.

Moreover, the assessment of basking sharks suffers from serious deficiencies as it relies on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that indicate frequent use of the waters. The failure to consider such data adequately leads to an incomplete baseline and further weakens the reliability of the presented conclusions.

These methodological shortcomings result in assertions of negligible or non-significant effects being based on unsubstantiated assumptions rather than solid evidence. The lack of sufficient baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions, creating uncertainty about the actual risks to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable and contains significant gaps in evidence and internal contradictions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, or habitat loss have not been thoroughly evaluated.

There is a notable 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 if 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 available evidence.

The evidence provided fails to show that seabirds connected with protected sites, such

as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding grounds is not properly considered, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate potential mortality, especially since baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and serious risk. It effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

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

The deficiencies noted also represent a failure to adhere to the 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 negatively impacted puts the proposal in direct conflict with national policy.

In summary, the assessment is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment concerning cultural heritage and community identity is alarming, as it does not acknowledge the West Lewis coastline as a vibrant cultural landscape. This area, where environment, language, tradition, and community are deeply interconnected, is treated reductively in the application, which views heritage merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These active burial sites, integral to spiritual practices, have been mischaracterised as static features, disregarding their current use, significance, and the effects of development on their surroundings. This oversight leads to an incomplete assessment of cultural impacts and neglects their vital role in community life.

The failure to consider intangible cultural heritage is another major concern. Elements such as the Gaelic language, traditions, and the enduring connection between the

community and the coastal environment are crucial to the area's identity, yet they are wholly omitted from the assessment. Without acknowledging these aspects, it is impossible to gain a true understanding of the cultural impact of the proposed development.

Moreover, there are pressing issues regarding community rights and engagement. The Gaelic-speaking population, which embodies the characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's credibility and disregards established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment represents a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018, and without it, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy standpoint, these shortcomings place the proposal in stark opposition to National Planning Framework 4, especially regarding the protection of historic assets and places. Ignoring both tangible and intangible heritage, as well as failing to recognise living cultural practices, constitutes a clear violation of policy requirements.

Ultimately, the collective failure to assess living heritage, intangible cultural value, community rights, and necessary statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately examined, and the application falls short in providing a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is fundamentally flawed due to a lack of transparency surrounding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report remains unpublished. This creates a significant evidential gap, obstructing both the public and the competent authority from grasping the full extent of social risks as identified by the developer's own research.

Summaries indicate that local residents are already facing measurable stress, anxiety, and concern as a result of the scale and proximity of the proposal. These impacts arise from direct engagement, making them factual rather than speculative. However, without the complete assessment, there is insufficient scrutiny of these findings, which limits the capacity to ascertain their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated

into the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly where community character and functioning could be at stake. The application, by omitting the full dataset, does not provide a comprehensive evidential basis to assess the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is crucial that development supports positive health outcomes and mitigates harm; however, existing evidence indicates adverse effects that remain undisclosed. Without the full assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of this situation are significant, as the competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material failure in the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the associated seascape and landscape implications is seriously flawed and does not sufficiently acknowledge the extent of change nor the sensitivity of the receiving environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. Introducing large-scale turbines in proximity to the shoreline would create a significant and ongoing industrial presence, which would fundamentally transform the character of this landscape in a permanent and irreversible way.

Moreover, the proposal fails to accurately portray the magnitude of the anticipated visual change. Due to their scale and proximity, the turbines would dominate 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 inadequately reflects the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the

most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the actual visual impact has been minimised, which calls into question the assessment's overall reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and affecting their connection to the natural horizon. This is not merely a visual concern; it represents a wider cultural and spatial detriment that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, especially regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further weakens any assertion of policy adherence.

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a credible evaluation and reinforce the position that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This results in an incomplete assessment of construction and pollution risks, hindering any meaningful evaluation of likely environmental effects. Instead, the application depends on undefined future mitigation and contingency measures, which raises concerns about their adequacy and effectiveness in such a sensitive environment.

The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not provide sufficient detail on prevention, control, or monitoring measures.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes that could arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological effects of these impacts, including potential consequences for sensitive marine species and habitats identified in the wider assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to evaluate whether appropriate safeguards are in place to handle pollution events. This introduces procedural risks and conflicts with the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be assessed prior to consent. The application also fails to demonstrate compliance with environmental protection and water quality policy requirements. Collectively, these deficiencies highlight that the absence of defined mitigation measures and the lack of detailed management plans render the assessment materially inadequate, preventing a robust evaluation of construction and pollution risks.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, both of which are inadequately addressed in the application. The assessment of fisheries and marine life fails to provide a comprehensive evaluation of the ecological and socio-economic impacts associated with the proposal. It does not sufficiently demonstrate that these vital uses and habitats can be safeguarded from significant disruption.

A crucial flaw lies in the assumption that fishing activities can be displaced without any adverse consequences. The lack of evidence supporting the availability or accessibility of alternative fishing grounds capable of accommodating additional pressure is a serious oversight. This gap in the assessment is particularly concerning, as displacing fishing activity risks overfishing in other areas, potentially leading to broader economic ramifications for the local fleet. Without a detailed and evidence-based analysis, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, primarily due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is likely to create disturbances over considerable distances, impacting species such as dolphins. The application underestimates the predicted disturbances affecting a significant portion of the local bottlenose dolphin population, which raises alarming concerns, particularly as it lacks sufficient supporting evidence to justify this downplaying of potential impacts.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is recognised, yet the impacts are simultaneously characterised as negligible. This contradiction undermines the

credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in light of anticipated harm that may require legal authorisation.

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

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any assertion that the proposal aligns with sustainable development principles.

In summary, the deficiencies highlighted, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions, lead to an incomplete and unreliable assessment. These shortcomings preclude a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure that is inadequately assessed and does not account for the comprehensive impacts of what constitutes a single integrated project. The separation of offshore turbines from onshore works leads to a disjointed evaluation, masking the true extent of environmental and socio-economic consequences.

Onshore activities encompass the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically delicate environment. The absence of a thorough assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

The deferral of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project elements; however, the disconnection between offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats, including machair systems and peatland ecosystems, which are afforded policy protection. The application fails to show that impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been put in place, highlighting a significant evidential gap in terms of biodiversity protection.

Concerns surrounding carbon balance also arise from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this issue or prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to conduct a comprehensive assessment of the entire project and to demonstrate adequate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly weakens the application.

In summary, the fragmentation of project components, the incomplete assessment, and the lack of evidence concerning environmental and land use effects render this aspect of the application unreliable and incomplete, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that is visible over long distances, which creates a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally impacts the night-time environment.

There is a significant absence of assessment regarding the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the area’s identity, as well as to the emerging sector of astro-tourism, this omission is particularly concerning. The overall landscape and environmental assessment lacks consideration of these impacts, creating a noticeable gap.

Moreover, there is no evaluation of the potential impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting due to phototaxis, a condition that can lead to disorientation and an increased risk of collision. The application fails to include any lighting impact assessment or phototaxis study, leaving unassessed how aviation lighting may impact these species and potentially increase mortality rates.

The reliance on daytime survey data in the ornithological assessment exacerbates this issue, as it does not account for nocturnal activity or the associated risks. Vulnerable species such as Kittiwakes, which may forage or migrate at night, face disorientation

from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data results in a critical shortfall in understanding ecological impacts.

Without a proper assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard, which would rule out adverse effects beyond reasonable scientific doubt, cannot be achieved, thus invoking the precautionary principle and obstructing a lawful determination.

From a policy perspective, these omissions conflict with National Planning Framework 4 regarding the protection of natural environments and the quality of ecosystems. This lack of consideration undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall ecological context.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife creates a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render 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 ramifications for a key sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the island has seen substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million. This sector supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this significance, the application does not evaluate how the industrialisation of the seascape and a potential decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or threaten a vital and expanding sector.

Furthermore, the assessment inadequately addresses the critical role of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to visitor experience. The importance of emerging markets, such as nature-based tourism and astro-tourism, is overlooked, and the absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a lack of understanding regarding impacts on a recognised and growing component of the local economy.

The implications extend beyond tourism, affecting employment, local businesses, and

community sustainability within an island community that already experiences limited economic diversification. The lack 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 falls short of demonstrating compliance with the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector, and fails to furnish adequate evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, to evaluate the environmental factors influencing visitor behaviour, and to consider the economic dependency of the island culminates in a significant evidential gap. This gap obstructs a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in terms of sustainable development, failing to meet statutory duties, national policy, and evidential standards. The issues presented echo those that led to the rejection of the Lewis Wind Power proposal in 2008, as the scale of industrialisation was deemed unacceptable. This current application is made under a more stringent policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for the application, with the use of an undefined design envelope, unspecified mitigation measures, and the omission of significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. This renders the Environmental Impact Assessment incomplete, hindering a full understanding of potential significant effects and residual impacts.

In terms of procedural integrity, the lack of a compliant Island Communities Impact Assessment breaches the statutory duty established by 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 the effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contravenes National Planning Framework 4, as it does not sufficiently protect biodiversity, natural habitats, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of net economic benefits due to the absence of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are notable, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Moreover, the proposal is set to cause significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, alongside adverse impacts on tourism, all represent permanent changes that cannot be sufficiently mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with conflicts with established policy and unresolved environmental risks, obstructs any lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or enforces regulatory provisions to compel the submission of the outstanding information. Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Additional Comments

I'm from Lewis. I was born and grew up there. Most of my family lives on the island and my children and I visit regularly for holidays. The island is a beautiful, wild place. Relying heavily on tourism for its economy these windfarms will have a massive impact. Not many people will want to visit a place which has been caged by giant machines. Not to mention the impact these will have on the ocean life. We only learned a few short years ago how badly some sea life is effected by boats and the noise pollution they create just by sailing the seas. The vibrations alone caused by these giant machines have the potential to devastate sea creatures and there habitat in ways we can't even imagine yet. As so often happens when people focus on profits and saving money to the detriment of every other creature on the planet.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AD88C024

Member of the public 1443

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents. It highlights significant deficiencies in planning, environmental assessments, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project in relation to statutory obligations, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful decision. Important environmental data is absent, baseline information is inadequate and inconsistent, and key details of the proposal remain unspecified. The flexible design framework employed complicates understanding of potential significant impacts, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or insignificant effects that lack robust backing.

There are evident and serious policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the development's acceptability within policy frameworks.

This development's scale is unprecedented for the area, with large turbines proposed near the shoreline, raising significant issues about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on vague mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and unfit for lawful consideration. Given these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and does not deliver a comprehensive, transparent, or reliable account of the likely environmental

consequences of the proposed development. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty compromises the integrity of the assessment and means that the impacts outlined may not accurately reflect the actual development that will be constructed. Consequently, both the public and the competent authority are unable to grasp the true extent of the environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed at a later stage obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and is in direct conflict with the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before any determination is made.

Significant evidential deficiencies are also present, including substantial gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application fails to meet the evidential threshold necessary under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity. It remains unproven that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, lack of specified mitigation measures, and gaps in baseline data makes the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives based on environmental effects, it presents a narrative detailing the evolution of the project. This method fails to prove that less damaging options have been thoroughly identified, assessed, and chosen over more harmful solutions.

There is no clear comparison of alternative offshore locations, development scales, or design configurations supported by evidence. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, where the visual, ecological, and coastal impacts are likely to be lessened. The sensitivity of the West Lewis coastline and the crucial role of proximity to the shore in determining impact highlight the significance of this missing analysis, which obstructs any conclusion that the proposed siting is indeed the least damaging option.

The inadequacies also extend to the cable routing and landfall assessment, where there is a lack of evidence to suggest that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been incorporated, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This signifies a failure to adhere to the established mitigation hierarchy, which is essential for the competent authority to ascertain whether there are less harmful and more appropriate alternatives available. The absence of a thorough alternatives assessment undermines the conclusion that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming jeopardises adherence to National Planning Framework 4, especially in terms of safeguarding natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, contributing to the overall finding that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding marine ecology and the assessment of protected species, which is materially deficient. The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the existing baseline data is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat use. This inadequacy leads to a lack of sound evidential basis for evaluating potential impacts.

Among the key issues is the failure to recognise and properly assess otters, a European Protected Species, and their active use of coastal areas for foraging and movement. The application does not take into account their core foraging range and behavioural patterns, which means the assessment does not adequately consider the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks exhibits similar deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions, which is likely to underestimate their presence. This is particularly concerning when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or give proper consideration to such data contributes to an incomplete baseline, further weakening the reliability of the conclusions presented.

The methodological limitations in the assessment result in conclusions of negligible or non-significant effects being based on assumptions instead of robust evidence. Additionally, the absence of sufficient baseline data hinders meaningful evaluations of cumulative and indirect impacts, which include seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

Furthermore, the assessment does not convincingly establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected.

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

The positioning of turbines within a designated migratory corridor presents an additional and considerable risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications of sustained mortality within this corridor or its potential impact on species with relatively small global populations.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fails to adequately assess the cultural heritage and community identity associated with the West Lewis coastline. This region should be regarded as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead, the application adopts a reductive view, treating heritage as a collection of isolated, static assets while neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet the assessment categorises them as static features. This approach fails to account for their continued use and meaning, as well as the impact of development on their settings. Such a mischaracterisation results in an incomplete evaluation of cultural effects and overlooks their importance within community life.

Furthermore, the assessment lacks consideration of intangible cultural heritage, which

encompasses the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the identity of the area, yet they are entirely omitted from the assessment, representing a significant oversight. The failure to include these factors inhibits a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement, particularly considering that the Gaelic-speaking population possesses a distinct cultural identity akin to that of Indigenous Peoples. The absence of a Free, Prior and Informed Consent process undermines the legitimacy of the assessment, failing to reflect established principles of participation in decisions that affect cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure, as it is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant and obstructs a lawful determination.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the disregard for living cultural practices, represents a clear departure from policy requirements.

In summary, the 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 properly evaluated, and the application does not provide an adequate basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the full Social Impact Assessment significantly undermines the integrity of the application. The developer engaged local residents through focus groups as part of the assessment, yet the comprehensive report remains unpublished. This omission creates a critical evidential gap that hinders public understanding and the competent authority's ability to evaluate social risks identified by the developer’s own research.

Available summaries highlight that residents are experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is limited, which restricts the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to community identity and cohesion, with “cultural loss” noted in the developer's findings.

Despite this, the impacts have not been adequately incorporated into the main application or weighted appropriately. The withholding of the complete Social Impact Assessment obscures the real human and social costs associated with the development.

The implications of this lack of disclosure extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and function may be at risk. The failure to provide the complete dataset results in an application that does not present a comprehensive evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development must promote positive health outcomes and mitigate harm, available evidence suggests existing adverse effects that have not been fully revealed. The absence of the full assessment precludes any demonstration of compliance with this policy.

The procedural ramifications of this situation are substantial. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy the evidential requirements established by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the interconnectedness of landscape and cultural heritage is significantly lacking and does not sufficiently consider the sensitivity of the receiving environment. The proposed large-scale turbines near the West Lewis coastline would introduce a continuous industrial presence that would fundamentally alter the area's undeveloped character and open Atlantic horizon. This change would result in a permanent and irreversible transformation of the landscape.

Moreover, the application inadequately represents the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and sense of remoteness that define this region. The assessment fails to convey the true significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not accurately reflect

the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the magnitude of visual impact, which undermines the assessment's reliability.

Additionally, there is a critical failure to evaluate the interconnected relationship among the landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments, are embedded in a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete understanding of the impacts on their cultural significance and setting.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This issue transcends visual impact, presenting a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which prioritises the protection of natural places and historic assets. The proposed scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further calls into question any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a thorough assessment of construction and pollution risks, leaving it insufficient for determining the likely environmental effects. It involves significant seabed preparation and installation activities in a high-energy Atlantic setting, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it suggests that mitigation and contingency measures will be established after consent is granted, obstructing any meaningful evaluation of their potential adequacy or effectiveness.

This uncertainty regarding future measures is particularly troubling, considering the sensitivity of the environment along the West Lewis coastline, which is home to clean

coastal waters and vital habitats susceptible to sediment disturbance and pollution. Although the application notes risks such as sediment mobilization and the possibility of chemical or oil spills, it lacks sufficient detail on methods to prevent, control, or monitor these occurrences.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

The concerns are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether adequate safeguards will be in place to address pollution incidents. This situation introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and clarity on potential impacts contributes to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the notion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its impact on local fisheries and marine ecosystems, as the assessment provided is incomplete and lacks a thorough examination of ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these important habitats and activities will be safeguarded from potential disruptions.

One major flaw in the proposal is the assertion that fishing activities can be displaced without any repercussions. There is no evidence presented that alternative fishing grounds exist or that they can accommodate the additional pressure resulting from displacement. This critical omission poses a risk of overfishing in other areas and could have serious economic implications for local fishermen. Without a solid, evidence-based assessment, the effects on fisheries and local livelihoods remain uncertain.

Additionally, the proposal poses significant risks to marine species, particularly due to underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to cause disturbances that could affect marine life over large areas, notably impacting local bottlenose dolphins. The application appears to minimize the importance of these potential effects, lacking adequate supporting evidence for such claims.

Moreover, there is a troubling inconsistency in the assessment where the requirement for licences to permit harm to European Protected Species is acknowledged, yet impacts are simultaneously claimed to be negligible. This contradiction undermines the reliability of the assessment and raises compliance issues with the Habitats Regulations, especially when potential harm is anticipated that necessitates legal authorisation.

The evaluation also neglects to take into account cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive assessment of these combined effects is essential to understanding the overall implications for marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application fails to demonstrate adherence to 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 avert unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal embodies sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment inadequate and unreliable. These shortcomings hinder a thorough evaluation of the potential 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.

TOURISM

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

Tourism on the Isle of Lewis has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not explore how the industrialisation of the seascape and the degradation of environmental quality

may impact the Tourism Gross Value Added or the resilience of the broader economy. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or potentially jeopardise this established sector.

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

In an island community where economic diversification is limited, the failure to properly evaluate tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been considered, contravening the requirements set out under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This proposal brings forth the same core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under an enhanced policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidence provided for determination. The application lacks a complete baseline data set, utilises an undefined design envelope, and depends on unspecified mitigation measures. Key impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

Moreover, procedural shortcomings are evident. The failure to conduct a compliant

Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a material omission. These deficiencies impede the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Conflicts with the National Planning Framework 4 are apparent in the proposal. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and the absence of tourism impact modelling precludes any evidence of a net economic benefit. The cumulative impact of both offshore and onshore elements has not been assessed properly, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties surrounding environmental risks that could prove significant. The assessments concerning 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 impeding a lawful conclusion on the acceptability of impacts.

The proposal would lead to considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism would yield permanent consequences that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively inadequate for determination. The vast information deficiencies, combined with policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to 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: 8A1E60FB

Member of the public 1444

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the proposal's scale, proximity, and design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Substantial conflicts with policy are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development as policy-compliant.

The unprecedented scale of the proposal raises significant concerns, with large turbines planned in close proximity to the shoreline, leading to issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In this context, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal fundamentally lacks the evidential support necessary for thorough assessment under the Habitats Regulations. This raises concerns about potential adverse effects on protected species and sensitive habitats, invoking the precautionary principle. The absence of a complete Environmental Impact Assessment Report is alarming, as it does not provide a full, transparent, or reliable account of the likely environmental effects associated with the development.

There is significant uncertainty stemming from the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This ambiguity undermines the integrity of the assessment, as it prevents a consistent application of a worst-case scenario, ultimately obscuring the true extent of environmental effects from both the public and the competent authority.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the notion that environmental harm will be addressed later hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation be established before determination.

Furthermore, the report exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, especially where the conclusions drawn indicate negligible or non-significant effects without robust supporting data. The lack of sufficient information complicates the understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory requirements.

Ultimately, the combination of reliance on an undefined design envelope, absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. Such deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the provided information. The failure to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, further emphasizes the critical nature of these oversights.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is significantly inadequate and does not fulfil the statutory requirements set out in the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of viable alternatives based on environmental effects, the application merely presents a narrative of project evolution. This methodology does not substantiate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a lack of transparent or evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered situating turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis obstructs any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where insufficient evidence exists to confirm that alternative routes have been thoroughly explored to avoid or reduce 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 the absence of comparative analysis indicate that mitigation through design has not been employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, which prevents the competent authority from ascertaining whether less harmful and more appropriate alternatives are available. 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 deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that leads to the overall conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and dependable understanding of the ecological receptors present in this sensitive marine area. The baseline data is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment fails to establish a credible evidential basis for understanding potential impacts.

Particularly concerning is the oversight regarding otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active usage of coastal regions for foraging and movement. This oversight neglects critical factors such as their core foraging range and behavioural patterns, leading to an inadequate assessment of the potential impacts stemming from construction activities, noise, and increased human activity. Such gaps significantly undermine any

assertions regarding the lack of significant effects on this species.

Additionally, the assessment of basking sharks suffers from deficiencies, primarily due to an over-reliance on aerial surveys that introduce substantial detection bias, especially under Atlantic conditions. This methodological approach is likely to underreport the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent utilisation of these waters. The failure to integrate or properly consider such data culminates in an incomplete baseline, thus diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects being based on conjectures instead of robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the genuine level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment framework and National Planning Framework 4, given that protected species have not been sufficiently identified or evaluated. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, lawful consent cannot be granted.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These inadequacies obstruct a thorough evaluation of the potential impacts on marine ecology and protected species, leading to the overarching conclusion that the application is devoid of a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed, containing substantial gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations that are already experiencing declines. However, the application does not adequately demonstrate that these species will remain unaffected, as required by the relevant evidential standards. The turbines are sited within vital foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate potential risks, including displacement, collision, and habitat loss.

There is a notable contradiction in the application where the developer asserts that there are no significant adverse effects, while also submitting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as

the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches adds uncertainty, particularly for species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain unclear.

The placement of turbines within a recognised migratory corridor presents an additional and serious risk, potentially obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

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

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

Collectively, these issues render the assessment unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the potential impacts and lead to the overall conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant shortcoming lies in the treatment of culturally important locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active for burial and spiritual practice, yet the assessment inaccurately presents them as static features, disregarding their current use, significance, and how the proposed development could affect their surroundings. This misinterpretation leads to an incomplete understanding of cultural implications, failing to acknowledge their integral role in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment is a significant concern that undermines the Environmental Impact Assessment process. Without this transparency, the competent authority cannot conduct a robust evaluation of the social, economic, and health implications of the proposed development. The absence of complete data constitutes a material omission and fails to meet the evidential requirements necessary for lawful decision-making.

Local residents have expressed measurable stress, anxiety, and concern due to the scale and proximity of the proposal, which reflects a tangible impact rooted in direct engagement. This evidence, derived from community feedback, highlights the risks associated with the development but remains inadequately addressed in the application due to the non-disclosure of the full assessment.

Moreover, the developer's findings indicate a perception of the proposal as a threat to

community identity and cohesion, with significant concerns about "cultural loss." However, these issues have not been fully integrated into the application or given proper consideration. As a result, the true human and social cost of the development remains obscured, limiting the ability to assess the overall significance of these impacts.

From a policy perspective, there is a failure to comply with National Planning Framework 4, which emphasizes the need for developments to support positive health outcomes and avoid harm. The existing adverse effects highlighted in the available evidence have not been sufficiently disclosed, making it impossible to demonstrate adherence to this policy.

Collectively, these issues reveal a concerning gap in the assessment process. The non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This hinders the ability to make a lawful determination regarding the application and highlights the necessity for a comprehensive understanding of the social impacts involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped landscape, offering a strong sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a dominant industrial presence that would permanently alter this unique character. The assessment of visual impacts fails to accurately convey the extent of this change. The turbines would significantly affect views from residential areas, historic sites, and popular coastal locations, leading to a loss of visual amenity and diminishing the qualities of naturalness and remoteness.

There are significant concerns about how visual viewpoints were selected and presented. Some viewpoints may not adequately represent the most sensitive areas or worst-case scenarios, especially concerning cultural heritage sites and valuable landscapes. This could lead to an understatement of the visual impact, raising doubts about the assessment's reliability.

Moreover, the assessment does not take into account the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked visually and spatially to the Atlantic horizon. By treating these sites as isolated, the assessment fails to consider their interdependent relationships, resulting in an incomplete evaluation of their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and their relationship with the natural horizon. This change represents a visual and broader cultural impact that has not been properly addressed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4,

particularly regarding the protection of natural landscapes and historic assets. The proposed changes are incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a solid worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and location of the turbines, their visual dominance would be unavoidable. Consequently, the change to the landscape would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and strengthen the argument that the proposal is not compatible with the preservation 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 application presents significant shortcomings in its assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the proposal does not adequately demonstrate that these vital uses and habitats can be safeguarded or sustained without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be displaced without any repercussions. There is no evidence provided to indicate that alternative fishing grounds are available, accessible, or capable of bearing increased pressure. This lack of information is concerning, as displacement could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise resulting from construction activities. The high-energy hammer piling expected to occur over an extended period is likely to cause disturbances across considerable distances, which could adversely affect species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population is alarming, yet the application minimizes the importance of these effects without adequate supporting evidence.

In addition, there is a notable inconsistency within the application regarding the requirement for licences to permit harm to European Protected Species, which is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction undermines the reliability of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal approval.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which prevents 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 collectively render the assessment incomplete and untrustworthy. These issues hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not fully account for the impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated separately. This fragmented approach obscures the true magnitude of environmental and socio-economic effects.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. Without a thorough assessment of these impacts, the application fails to provide a complete understanding of the project's environmental footprint.

By not including or delaying the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the distinct treatment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and communities.

Additionally, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been considered. This creates a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter or illustrates that the overall carbon balance is indeed advantageous.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The assessment fails to address the impacts of dark skies and nocturnal wildlife, marking a significant omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment.

Additionally, the application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the region's identity and the emerging astro-tourism sector heightens the significance of this oversight, leading to a clear gap in the overall landscape and environmental assessment.

More importantly, there is a lack of assessment concerning the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application fails to include any lighting impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the associated risk of increased mortality.

This lack of evaluation is worsened by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or the risks that accompany it. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this has not been assessed. Consequently, the absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites would 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 hindering a lawful determination.

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecology.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot adequately support a lawful determination.

TOURISM

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the necessary standards of sustainable development, which are outlined in statutory duties, national policy, and evidential criteria. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in numerous critical areas.

There are significant deficiencies in the evidential foundation required for decision-making. The application lacks comprehensive baseline data and relies on an undefined design envelope, with unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

Moreover, procedural failings are evident in the submission. The absence of a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a material omission, which hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural spaces, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore components has not been properly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks presented in the application remain uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination that the impacts are acceptable.

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

In light of these collective issues, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, impede the possibility of a lawful and

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

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: 87930B27

Member of the public 1445

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 proposal seeks consent based on an Environmental Impact Assessment Report that is materially deficient, lacking a comprehensive, transparent, and reliable account of the likely environmental effects. It employs a flexible Project Design Envelope without specific commitments to turbine dimensions, layouts, or configurations, introducing substantial uncertainty. This approach undermines the integrity of the assessment and obscures the true environmental impacts of the development, hindering both public understanding and the competent authority's ability to evaluate the implications accurately.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the premise that environmental harm will be managed later obstructs meaningful evaluation and assessment of residual impacts. This deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies are clearly established prior to determination.

Moreover, there are notable evidential deficiencies, such as gaps in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. These shortcomings create uncertainty concerning the scale and significance of impacts, especially in instances where conclusions of negligible or non-significant effects are posited without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not meet the evidential threshold stipulated under the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle is particularly relevant regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially concerning biodiversity protection and environmental integrity, as it fails to show that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an ambiguous design envelope, the absence of specified mitigation, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and robust assessment of environmental effects and leave the competent authority ill-equipped to make an informed determination based on the provided information.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included engagement with local residents through focus groups. However, the full report has not been published, leading to a significant evidential gap that hinders public understanding and the competent

authority's ability to assess social risks identified in the developer's research. Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative, yet without the full assessment, there is limited capacity for proper scrutiny of these findings, making it difficult to ascertain their significance in the decision-making process.

Moreover, the development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this recognition, such impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is vital for developments of this nature, especially when they may affect community character and functioning. The failure to provide the full dataset results in an application that lacks a comprehensive evidential basis to weigh the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm; however, existing adverse effects have not been fully disclosed. Without access to the complete assessment, demonstrating compliance with this policy is impossible. The procedural implications are profound, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission signifies a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable, which ultimately obstructs a lawful determination and supports the view that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and environmental impacts is significantly inadequate, failing to capture the true extent of change and the sensitivity of the landscape. The character of the West Lewis coastline, marked by its open Atlantic horizon and undeveloped nature, embodies a strong sense of remoteness. The proposed large-scale turbines located near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application lacks a thorough representation of the magnitude of this visual change. Given their scale and proximity, the turbines 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 adequately articulate this level of impact or its significance within such a sensitive landscape.

Methodological concerns arise in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may fail to fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the true magnitude of visual impact has been understated, thus undermining the credibility of the assessment.

Another critical shortfall is the lack of evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments exist within a wider landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these important assets as isolated, neglecting their interdependence and leading to an incomplete analysis of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these essential connections, transforming how heritage assets are perceived and disrupting their relation to the natural horizon. This not only poses a visual impact but also inflicts broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the protection of natural environments and historic assets. The proposed scale of change is fundamentally at odds with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertions of compliance with policy requirements.

It is evident that the identified impacts are not amenable to effective mitigation. The scale, height, and proximity of the turbines would ensure their presence is both dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation strategies.

Overall, the assessment falls short in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this landscape.

TOURISM

The assessment concerning tourism impacts is notably lacking and does not adequately examine the economic and social repercussions for a vital component of the Isle of Lewis's economy. The region's tourism relies heavily on its wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. The application recognises that 86% of visitors are attracted by the scenery, yet it does not provide any quantifiable analysis of how extensive offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Tourism has experienced remarkable growth, climbing from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, representing up to 16% of the island's economy. However, the application fails to model how the industrialisation of the seascape and the consequent degradation of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience. Without this analysis, it remains unclear if the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in bolstering tourism. This includes the vital role of unspoiled landscapes and dark skies in enhancing visitor experiences, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the oversight in assessing tourism impacts has broader ramifications for employment, local businesses, and the sustainability of the community. The failure to provide 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, particularly regarding economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency results in a considerable evidential gap. This hinders a comprehensive 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 standards required for sustainable development when evaluated against statutory responsibilities, national policies, and evidence-based criteria. This application echoes the primary concerns that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Currently, this proposal is presented under a strengthened policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant issue with the application is its lack of a comprehensive and reliable evidential foundation for assessment. It exhibits critical gaps in baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures.

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

There are evident procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the nondisclosure of 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, thereby rendering the application unsuitable for determination.

Furthermore, the proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. The application also fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to an obscured understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

Overall, the application is fundamentally unfit for determination, both procedurally and substantively. The extensive information gaps, combined with policy inconsistencies and unresolved environmental risks, obstruct any lawful and evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory measures to necessitate the submission of the missing information.

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

Additional Comments

The health implications it will have o the islanders, the fact that there isn’t one any where near as big as what’s proposed in the uk, and that we aren’t even benefiting from

it it’s for already profitable international businesses, it will seriously harm our beautiful sea and landscape and visual views, which will in turn affect tourism

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: 81AD3ED7

Member of the public 1446

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 inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the potential environmental effects of the proposal. By employing a flexible Project Design Envelope without committing to defined turbine dimensions, layouts, or configurations, the application introduces significant uncertainty. This approach hinders the consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts reported may not accurately represent the actual development, which in turn prevents both the public and the competent authority from grasping the full extent of the environmental consequences.

Moreover, the application places considerable reliance on unspecified mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental damage will be managed at a later stage, there is a significant barrier to conducting a meaningful evaluation of the measures' effectiveness or assessing any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation strategies be clearly articulated before determination.

The report also suffers from substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is a critical requirement under the Environmental Impact

Assessment regime. Instead of thoroughly assessing potential options based on their environmental effects, it presents a narrative that outlines the project's evolution. This lack of rigorous analysis means that less harmful alternatives have not been properly identified or selected over more damaging options.

Furthermore, there is an absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has adequately considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. Given the delicate nature of the West Lewis coastline, and the importance of proximity to the shore in determining impacts, this oversight undermines the validity of the proposed siting as the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is insufficient evidence of exploration of alternative routes that could avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, with an overreliance on post-design mitigation measures.

As a result, the application does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, obstructing 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 established that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species presented in the application is materially deficient. It fails to provide a complete or reliable understanding of the ecological receptors within this area. The methodologies employed do not adequately capture species presence, behaviour, and habitat use, leading to an incomplete baseline data set. Consequently, the assessment lacks a sound evidential basis for evaluating the impacts of the proposed development.

One significant oversight is the assessment of otters, a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. It neglects to consider their core foraging range and

behavioural patterns, which means the potential effects of construction disturbance, noise, and increased activity on otters have not been adequately assessed. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks is similarly flawed, as it relies heavily on aerial surveys that introduce a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when contrasted with established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and further weakens the reliability of the conclusions drawn in the application.

These methodological shortcomings imply that the conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. The absence of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and wider ecosystem interactions. This leads to uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4. The failure to properly identify or assess protected species creates a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fundamentally flawed in its ornithological assessment, which suffers from significant evidence gaps and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already facing decline. However, the application fails to provide the necessary evidence to show that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the proposed development, yet the assessment does not thoroughly evaluate critical issues such as displacement, collision risk, or habitat loss.

A serious contradiction is evident in the application, as the developer asserts no significant adverse effects while also arguing a case for Habitats Regulations derogation, a process that is only invoked when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the

conclusions are not substantiated by the evidence presented. Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of their feeding grounds is not comprehensively addressed, and the reliance on modelling techniques introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, especially when baseline data is incomplete and species behaviours are not fully understood.

The location of turbines within a recognised migratory corridor poses another serious risk, creating a barrier along a primary flight path for birds migrating between the United Kingdom and Iceland. The application lacks a thorough examination of the long-term consequences of ongoing mortality in this corridor and does not consider the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle, thus hindering any lawful conclusion that could support consent.

Collectively, these deficiencies represent a significant failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to conclusively demonstrate that internationally important seabird populations will not face adverse effects places the proposal in direct conflict with national policy. Overall, the assessment's unreliability stems from its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development fundamentally lacks adequacy in terms of cultural heritage and community identity. The West Lewis coastline should be regarded as a living cultural landscape where the interconnection of environment, language, tradition, and community is vital. However, the application adopts a simplistic viewpoint that reduces heritage to mere static assets, ignoring their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming lies in the handling of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment treats them as static features. This narrow perspective fails to acknowledge their ongoing significance and the effects of development on their settings. Such mischaracterisation leads to an incomplete assessment of cultural impacts and neglects their integral role in community life.

The assessment is also deficient in its consideration of intangible cultural heritage.

Essential elements such as the Gaelic language, local traditions, and the community's deep-rooted relationship with the coastal environment are absent from the evaluation. These elements are crucial to the identity of the area and their omission represents a glaring oversight. Without incorporating these factors, the cultural implications of the proposed development remain inadequately understood.

Moreover, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population represents a distinct cultural identity akin to that 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 align with established principles of participation in matters that affect cultural and environmental interests.

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

From a policy standpoint, these deficiencies create a direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, and to recognise living cultural practices, signifies a clear deviation from policy requirements.

Collectively, the neglect of assessing living heritage, intangible cultural value, community rights, and statutory obligations results in a critical evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not establish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impact assessment associated with the development is significantly lacking in transparency, making it impossible to conduct a lawful evaluation. Although the developer conducted a Social Impact Assessment and engaged with local residents through focus groups, the full report has not been made available. This creates a major evidential gap, which hampers both public understanding and the competent authority's ability to gauge the social risks outlined by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, based on direct engagement rather than speculation. However, the absence of the complete assessment restricts the ability to scrutinise these findings fully and diminishes their significance in the decision-making process.

Moreover, there are indications that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been adequately incorporated into the main application or given the

necessary consideration. The lack of transparency regarding the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This deficiency compromises the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application cannot provide a thorough evidential basis for assessing the trade-offs between benefits and detriments.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available points to current adverse effects that have not been fully disclosed. Therefore, without the complete assessment, it is impossible to demonstrate compliance with this policy.

The implications of this situation are considerable. The competent authority cannot perform a comprehensive socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential standards set by 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 both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts does not adequately reflect the scale of change or the sensitivity of this environment. The introduction of large-scale turbines near the shoreline would create a dominant industrial presence, fundamentally altering the character of the landscape and resulting in a permanent transformation.

The application fails to accurately portray the magnitude of the visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This domination would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not properly convey this level of impact or its significance in such a sensitive landscape.

Moreover, there are concerns regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the

possibility that the magnitude of the visual impact has been understated, thereby undermining the reliability of the assessment.

Another deficiency is the lack of assessment of the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated assets without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt the relationships between these heritage assets and alter the context in which they are experienced. This disruption not only represents a visual impact but also a broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The absence of a robust worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is fundamental and permanent, making it impossible to reduce to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The application 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 proposal presents serious deficiencies in its assessment of fisheries and marine life, failing to deliver a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate the ability to protect or maintain these habitats and uses without causing significant disruption.

A notable flaw in the application is the assumption that fishing activity can be relocated without adverse effects. There is no evidence provided to confirm that alternative fishing grounds exist, are accessible, or can bear the additional fishing pressures. This significant omission could lead to overfishing in alternative areas and could have broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment hampers the understanding of potential impacts on fisheries and local livelihoods.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is expected to cause disturbances over large distances, impacting species such as dolphins. The predicted disturbance to a

considerable portion of the local bottlenose dolphin population is alarming; yet the application downplays these effects without adequate supporting evidence.

There is an evident contradiction within the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially in areas where anticipated harm 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. Without a thorough evaluation 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 fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby hindering any conclusion that the proposal represents sustainable development.

In conclusion, the lack of 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 potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

By not adequately addressing the onshore impacts, the application inhibits a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, it is essential that all elements of a project are considered collectively. The

current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment 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 play a crucial role in defining environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect on the western horizon. This change would fundamentally alter the night-time environment.

The application lacks a thorough evaluation of how this lighting might impact visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the area's identity and the growing tourism sector focused on astro-tourism. The absence of these considerations results in a notable deficiency in the overall landscape and environmental evaluation.

Moreover, there has been no assessment of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to the effects of artificial lighting due to phototaxis, which can result in disorientation and a heightened risk of collision. The application fails to include any form of lighting impact assessment or phototaxis study, neglecting to examine how aviation lighting may influence these species or contribute to increased mortality.

This lack of evaluation is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or its associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation due to artificial lighting, yet this potential hazard has not been assessed. The absence of site-specific night-time data creates a substantial void in understanding ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning 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 an integral aspect of the environment.

Overall, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The evaluation of tourism impacts is inadequate and neglects to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs while representing up to 16% of the island's economy. Despite this, the application fails to analyse how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the resilience of the wider economy.

Tourism fundamentally relies on the island's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or overall economic contributions. Additionally, the significance of environmental quality

in supporting tourism has not been adequately addressed. The importance of unspoiled landscapes and dark skies to the visitor experience, along with the potential for growth in markets such as nature-based tourism and astro-tourism, has been overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the impacts on an important and expanding sector 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 thorough Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

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

In summary, the combination of unquantified tourism impacts, an inadequate assessment of environmental factors influencing visitor behaviour, and a lack of consideration for the island's economic dependency creates a significant evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. The application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. This current proposal is put forth under a policy framework that supposedly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not satisfy these requirements.

There are substantial shortcomings in the evidential basis for determining the application. Critical gaps exist in baseline data, with an undefined design envelope and unspecified mitigation measures. Furthermore, key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of potential significant effects and residual impacts.

Additionally, procedural issues are evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to present a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic

resilience, making the application unfit for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impact of offshore and onshore components has not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle, which prevents a lawful conclusion that impacts are acceptable.

Furthermore, the proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and negative implications for tourism are all permanent effects that cannot be mitigated to an acceptable level.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 670C23CD

Member of the public 1447

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report and other relevant documents, revealing serious deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. There are fundamental issues regarding the scale, design, and proximity of the proposal in relation to statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation for a lawful decision. There is a lack of critical environmental data, limited and inconsistent baseline information, and many aspects of the proposal remain undefined. The flexible design framework complicates the assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially regarding biodiversity, natural areas, cultural heritage, and public health. It does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine if the development aligns with policy requirements.

The proposal's scale is unprecedented for this area, with large turbines located near the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental repercussions. In light of the insufficient information, reliance on unclear mitigation strategies, evidential shortcomings, and clear policy non-compliance, it is apparent that the application is incomplete and does not support a lawful decision. Therefore, the precautionary principle should be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to provide a reliable understanding of the environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope,

which avoids committing to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty compromises the integrity of the assessment, rendering the presented impacts potentially unreflective of the actual development that may be constructed. As a result, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The lack of a structured and comparative assessment of alternatives represents a significant deficiency in the application, undermining compliance with the Environmental Impact Assessment regime. It fails to provide a thorough evaluation of realistic alternatives based on environmental effects and instead offers only a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been properly identified or assessed in preference to more damaging

solutions.

Furthermore, the application does not include a transparent or evidence-based comparison of different offshore locations, development scales, or design configurations. Specifically, it does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be reduced. The sensitivity of the West Lewis coastline is crucial, and the absence of analysis regarding proximity to shore prevents any conclusion that the proposed siting is the least damaging option.

Deficiencies in cable routing and landfall assessment are also evident, as there is insufficient evidence that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation through design has not been applied, leading to a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to determine whether less harmful and more appropriate alternatives exist. Without a comprehensive alternatives assessment, it cannot be established that the proposal is sustainable or compliant with policy.

From a policy standpoint, these inadequacies compromise alignment with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured assessment is a material omission that contributes to the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to give a complete or reliable understanding of the ecological receptors in the West Lewis coastal area. This marine system is sensitive and biologically active, yet the baseline data is incomplete, and the methods used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not provide a strong evidential basis for evaluating impacts.

One significant gap is the assessment of otters, which are a European Protected Species. The application does not sufficiently recognise or evaluate their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behaviour means that the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This undermines any conclusions regarding significant effects on this species.

There are also shortcomings in the evaluation of basking sharks. The reliance on aerial

surveys creates a significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The lack of consideration for such data results in an incomplete baseline and undermines the reliability of the conclusions.

These methodological shortcomings mean that conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders the meaningful assessment of cumulative and indirect impacts, such as seasonal variations and wider ecosystem interactions. This uncertainty clouds 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 protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application lacks reliability, marked by significant internal inconsistencies and methodological weaknesses that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing decline. Despite this, the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated within the development zone, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises within the application, where the developer asserts there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, an indication that significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment and suggests that the conclusions are unsupported by the available evidence.

The assessment falls short in demonstrating that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. Furthermore, the significance of these vital feeding grounds is inadequately considered. The reliance on modelling approaches introduces a level of uncertainty, especially for vulnerable species such as Kittiwakes and Fulmars, with the methodologies likely to underestimate potential mortality given the incomplete baseline data and insufficient

understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional substantial risk by effectively creating a barrier in a key flight path utilised by species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor are not sufficiently assessed, nor are the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the necessary evidential threshold to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and obstructs a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding the protection of biodiversity and natural assets. The failure to convincingly demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

Overall, these inadequacies render the assessment untrustworthy and compromise the ability to evaluate impacts thoroughly, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The submission of the application raises substantial concerns regarding the assessment of social impacts, health, and wellbeing, which is critically deficient and lacks the requisite transparency for a lawful evaluation. The developer engaged in a Social Impact Assessment, which included consultations with local residents; however, the comprehensive report remains unpublished. This absence constitutes a significant evidential gap that obstructs both public understanding and the competent authority's ability to fully grasp the social risks outlined in the developer's own research.

Existing summaries reveal that residents are currently enduring significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement and are therefore factual rather than speculative. The failure to disclose the complete assessment inhibits proper scrutiny of these findings and limits the determination of their significance within the decision-making process.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings indicating a potential for "cultural loss." Despite this acknowledgment, these detrimental impacts have not been adequately incorporated into the main application or afforded appropriate weight. The lack of access to the full Social Impact Assessment obscures

the true human and social costs associated with the development.

This absence of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, especially when community character and functionality are potentially at stake. The failure to provide the complete dataset results in an application that lacks a thorough evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not satisfactorily demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avert harm, yet the available evidence suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is unattainable.

The procedural ramifications are considerable. The competent authority is unable to perform a rigorous socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and indicates a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, combined with evidence of current adverse effects, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in its assessment of construction and pollution risks, as it lacks the necessary detail to evaluate the likely environmental effects adequately. It entails considerable seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, it relies on undefined mitigation and contingency measures that are to be prepared after consent, which hinders any meaningful evaluation of their potential adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate details on how these risks will be prevented, controlled, or monitored.

Moreover, there is a lack of clarity regarding the scale and behaviour of sediment

plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats previously identified as sensitive in the broader assessment.

The failure to include 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 incidents. This situation introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of vital environmental safeguards is inconsistent with the requirements set forth by the Environmental Impact Assessment regime. The assessment of likely significant effects and appropriate mitigation must occur prior to consent, and the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with existing policy requirements regarding environmental protection and water quality.

In summary, the deficiencies in the defined mitigation measures, the lack of detailed management plans, and the uncertainties concerning potential impacts render the assessment materially incomplete. These shortcomings impede a thorough evaluation of construction and pollution risks, further substantiating the conclusion that the application is inadequate.

FISHERIES AND MARINE LIFE

The assessment of the application is fraught with significant deficiencies that directly impact marine ecosystems and local fishing industries. There is an alarming lack of a thorough evaluation regarding the ecological and socio-economic impacts on the diverse marine life and active fishing operations off the West Lewis coast. The assumption that fishing activities can be displaced without repercussions is particularly concerning. No evidence is presented to indicate the availability or accessibility of alternative fishing grounds, nor is there any indication that these grounds could support the additional fishing pressure, raising the risk of overfishing elsewhere and jeopardising the local fleet's economic stability.

Moreover, the proposal poses considerable risks to marine species, especially from the underwater noise created during construction. The anticipated high-energy hammer piling is likely to cause extensive disturbance, potentially affecting a significant portion of the local bottlenose dolphin population. Despite the gravity of these predictions, the application downplays the severity of such impacts, lacking sufficient supporting evidence.

Additionally, the application contains an internal inconsistency that warrants immediate scrutiny. While it acknowledges the necessity for licences to permit harm to

European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction not only undermines the credibility of the entire assessment but also raises serious questions about compliance with the Habitats Regulations, particularly when anticipated harm demands legal authorisation.

The failure to assess cumulative impacts is another critical shortfall. The assessment does not adequately consider the combined effects of habitat disturbance, noise pollution, and the displacement of fishing activities. This omission severely hampers the ability to ascertain the overall implications for marine ecosystems and the socio-economic conditions of the area.

From a policy perspective, there is a clear non-compliance with both the National Planning Framework 4 and the National Marine Plan. The application does not demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus undermining the conclusion of sustainable development.

In summary, the myriad of deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the impacts on fisheries and marine life, necessitating immediate action to address these critical issues.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not take into account the full extent of impacts from what is a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. This construction includes excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By deferring or excluding the assessment of onshore impacts, the application does not allow for a proper evaluation of cumulative effects. Environmental Impact Assessment requires that all parts of a project are considered together, but the distinction between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

There are also considerable risks to sensitive habitats such as machair systems and peatland environments, which have policy protections. The application does not show

that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been taken, creating a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance are also raised by the proposal. Disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising questions about deliverability and lawful implementation.

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

Overall, 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, making a lawful determination impossible.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include an assessment of dark skies and nocturnal wildlife, which represents a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. 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.

Additionally, the application does not evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important given the role of dark skies in the area's identity and the growth of tourism sectors such as astro-tourism. The lack of consideration for these effects indicates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the potential effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be sensitive to artificial lighting because of phototaxis, which can lead to disorientation and a higher risk of collision. The proposal lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or increase mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity and associated risks. Species like Kittiwakes may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also weakens the broader evaluation of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

TOURISM

The proposal presents a serious deficiency in assessing tourism impacts, neglecting to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The success of tourism is inherently linked to the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are motivated 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.

Tourism on the island has seen substantial 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 this growth, the application does not explore how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a significant gap in understanding impacts on an acknowledged and growing component of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess tourism impacts holds broader implications for employment, local enterprises, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated, as mandated by the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a considerable evidential gap. This absence hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is characterised by significant inadequacies that undermine its compliance with the principles of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application echoes the central issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to address these critical concerns.

A thorough examination reveals that the application lacks a comprehensive and reliable evidential foundation necessary for determination. There are notable deficiencies in baseline data, reliance on an ill-defined design envelope, and unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide a clear understanding of potential significant effects or residual impacts.

Moreover, procedural failures are evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment constitutes a significant omission, hindering the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unsuitable for determination.

The proposal also conflicts with the National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a

net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals exhibit internal inconsistencies. The evidential threshold necessary to definitively rule out adverse effects has not been met, thereby invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to substantial and irreversible alterations to a landscape of high sensitivity. The industrialisation of the Atlantic-facing coastline, deterioration of dark skies, disruption of cultural and visual connections, and negative impacts on tourism signify permanent changes that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is essential that the competent authority either refuse consent on these grounds or activate the relevant regulatory provisions to compel the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8E0D0AAA

Member of the public 1448

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 processes. The objection arises from a review of the Environmental Impact Assessment Report and related documents. It highlights significant deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and design, as these factors challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful determination. Important environmental data is absent, baseline information is insufficient and inconsistent, and vital components of the proposal remain undefined. The use of a flexible design framework does not allow for a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures means their efficacy cannot be evaluated. Consequently, the documents fail to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are notable and significant conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests required for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The proposal's scale is unprecedented for this area, with large turbines sited near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental effects. Overall, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, failing to offer a comprehensive, transparent, or dependable account of the potential

environmental consequences of the proposal. The flexible Project Design Envelope, which lacks concrete commitments regarding turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity undermines the integrity of the assessment process, resulting in a presentation of impacts that may not accurately represent the final development. Consequently, both the public and the competent authority are left without a clear understanding of the true environmental effects.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be mitigated at a later stage, the application precludes any meaningful evaluation of the proposed measures' effectiveness or a proper assessment of residual impacts. This deferral of essential information to post-consent stages contravenes the intent of the Environmental Impact Assessment regime, which necessitates that significant effects and their mitigations are clearly outlined prior to decision-making.

Evidential deficiencies abound, including inadequate baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such gaps lead to uncertainties concerning the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are put forth without solid supporting data. This insufficiency of information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not meet the evidential requirements under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly with respect to protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it does not substantiate that impacts have been fully assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for assessing potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and raises serious concerns among the local community. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide the necessary evidence to show that these species will not face adverse effects as a result of the development. Key foraging areas and migratory pathways have not been adequately evaluated, with significant gaps in the analysis regarding displacement, collision risk, and habitat loss.

Moreover, the application contains a critical contradiction. The developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence presented.

Additionally, there is insufficient evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches raises uncertainties, particularly concerning species like Kittiwakes and Fulmars that are already experiencing severe decline. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

The placement of turbines within a recognised migratory corridor creates a significant risk, effectively establishing a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, as well as the potential consequences for species with small global populations, have not been thoroughly assessed.

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

The identified deficiencies highlight 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 in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a robust evaluation of impacts and collectively suggest that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to properly assess the cultural heritage and community identity associated with the West Lewis coastline, which should be recognised as a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming of the application is its treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment reduces them to static features without considering their continued use and significance or the potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects, neglecting their integral role in community life.

Additionally, the assessment overlooks intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity and their absence from the evaluation represents a substantial omission. Without factoring in these aspects, it is impossible to gain a full understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics recognised under Indigenous People, yet the application lacks a process of Free, Prior and Informed Consent. The absence of meaningful engagement not only undermines the legitimacy of the assessment but also fails to adhere to established principles of participation concerning decisions that affect cultural and environmental interests.

Furthermore, a notable procedural failure is the lack of a compliant Island Communities Impact Assessment, as required under the Islands (Scotland) Act 2018. This absence hinders the competent authority's ability to meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, thus preventing a lawful determination of the proposal.

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

In summary, the insufficient assessment of living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted by the developer's own research. Summaries indicate that residents are already

experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement and are not speculative, yet the inability to access the complete assessment prevents proper scrutiny of these findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” identified in the developer’s findings. Nonetheless, these impacts have not been fully incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be compromised.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

The procedural ramifications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application and fails to meet the evidential requirements outlined by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment, obstructing a lawful determination and highlighting that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking, failing to capture the true extent of the changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline is defined by its open view of the Atlantic and its undeveloped, remote nature. The proposed large-scale turbines would intrude upon this landscape, establishing an industrial presence that would irrevocably alter its character and result in a permanent transformation.

Furthermore, the evaluation does not accurately depict the magnitude of the visual alterations that would occur. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic locations, and popular coastal spots. This dominance would have a detrimental effect on visual amenity and diminish the essential qualities of naturalness and remoteness that define this area. The assessment's failure to adequately address the significance of these impacts in such a sensitive landscape is concerning.

Methodological flaws have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most severe scenarios, especially concerning critical cultural heritage sites and valued landscapes. This oversight raises the possibility that the true scale of the visual impact has been underestimated, calling into question the reliability of the assessment's findings.

Additionally, the assessment does not adequately consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these assets as isolated entities neglects their interdependence, resulting in an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context within which heritage sites are appreciated and breaking their link to the natural horizon. This represents not only a visual impact but also a cultural and spatial harm that the application has not sufficiently addressed.

From a policy standpoint, the proposal contradicts the guidelines outlined in the National Planning Framework 4, particularly regarding the protection of natural landscapes and heritage sites. The extent of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further compromises the proposal's compliance with established policy.

It is evident that the impacts highlighted cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in fundamental and permanent changes that cannot be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the need to protect this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess environmental impacts, particularly concerning construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that are to be developed after consent, which raises immediate concerns about the adequacy and effectiveness of such plans. This is especially troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment.

Risks associated with sediment mobilisation and accidental spills of chemicals or oil have been acknowledged in the application; however, there is insufficient information on how these risks will be managed, controlled, or monitored. Furthermore, there is considerable uncertainty regarding the nature and scale of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the potential ecological effects, duration, or extent of these impacts. This uncertainty also applies to marine species and habitats that are already recognised as sensitive within the broader assessment.

The shortcomings are exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether adequate measures are in place to address pollution events. This creates procedural risks and limits the competent authority's capacity to assess environmental protection effectively at the point of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that significant effects and mitigation measures be evaluated before consent is granted, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with essential policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

The proposal introduces notable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged high-energy hammer

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal presents a significant evidential gap due to the absence of assessments concerning dark skies and nocturnal wildlife, which are crucial components of the Environmental Impact Assessment. The exceptionally dark skies of the West Lewis coastline contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This alteration of the night-time environment raises concerns regarding visual amenity, landscape character, and the experiences of residents and visitors.

Furthermore, there is a critical lack of evaluation regarding the impacts of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The application notably lacks a lighting impact assessment or a phototaxis study, failing to address how the proposed aviation lighting may impact these vulnerable species or potentially raise mortality rates.

The shortcomings are exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate during the night, are similarly at risk of disorientation due to artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates an essential gap in understanding the ecological impacts of the proposal.

As a result, it is impossible to ascertain whether protected species or designated sites would be adversely affected without a thorough assessment of nocturnal impacts. The application fails to meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and preventing a lawful determination.

In terms of policy, the omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader assessment of landscape and seascape impacts, as the character of the night environment is an integral aspect of the overall ecological setting.

In summary, the absence of any assessment focused on dark skies and nocturnal wildlife reveals significant flaws in the application. The lack of baseline data, impact modelling, and species-specific analysis renders it incomplete, thus incapable of supporting a lawful determination.

TOURISM

The inadequacy of the tourism impact assessment is striking, as it neglects to analyse the economic and social repercussions for a vital sector of the Isle of Lewis economy. The growth of tourism has been remarkable, increasing from £65 million in 2017 to over £81.5 million, and this sector supports more than 1,000 jobs, making up to 16% of the island's economy. Despite its significance, the application fails to model how the proposed industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the overall resilience of the economy. This oversight raises questions about whether the development would actually provide a net economic benefit or jeopardise a thriving sector.

Furthermore, the application does not adequately address the crucial role that environmental quality plays in attracting visitors. The wild coastline, pristine landscapes, and dark skies are fundamental to the tourist experience, yet the assessment omits a Dark Skies Assessment, leaving a substantial void in understanding the potential impact on growing markets such as nature-based tourism and astro-tourism. This lack of consideration hampers the ability to evaluate how large-scale offshore infrastructure could change visitor behaviour, numbers, and economic contributions.

The deficiencies in assessing tourism impacts have broader implications for employment, local businesses, and community sustainability in an island community

that lacks economic diversification. The failure to carry out a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined, which is necessary as stipulated 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 requirement to prove net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and falls short of providing sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the lack of a thorough evaluation of tourism impacts, the disregard for environmental factors influencing visitor behaviour, and the failure to acknowledge the island's economic dependency culminate in a significant evidential gap. This gap undermines a comprehensive assessment of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application echoes the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains insufficient.

The application lacks a comprehensive and reliable evidential foundation for decision-making. Significant gaps in baseline data persist, accompanied by the use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of critical impact pathways such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the 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, making the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components

has not been adequately conducted, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties and potential risks to the environment. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent on these bases or invoke the relevant regulatory provisions to compel the submission of the necessary 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 increasingly disturbed by the scale of these wind farm developments, and the impact on sea life and local communities. This is a colossal proposal, FAR too big in scale, would be hugely environmentally damaging despite being dressed up as a green initiative. It all seems to be for huge profit at the taxpayer's expense. So many things wrong with it I don't know where to start.

I have visited Lewis regularly for my holidays over the past 10 years - stayed in Uig/Valtos 5 times since 2017. This would certainly put me off returning, as it's already become so much more difficult & expensive to visit, due to ferry crises and the rapidly escalating cost of holiday accommodation.

But whether I return or not, I care very much about the welfare of the islanders and the beautiful environment which this development proposes to wilfully destroy.

The short term life of these monster turbines - the concrete involved - the seabed destruction - the damage to seabird populations - the damage to marine life - all of these and more are my objections.

We are fighting a similar proposal at Berwick Bank here on the East coast so I am aware of the issues and I strongly oppose this development.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 72D26846

Member of the public 1449

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

Dear Sir/Madam

This objection is formally lodged against 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's location off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity, raises significant issues. The scale, proximity, and design of the proposal present fundamental concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

An adequate evidential basis for a lawful determination is lacking, as critical environmental data is missing and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined. The flexible design framework utilised prevents a clear understanding of likely significant effects, and without specified mitigation measures, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantive policy conflicts are evident, as the proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

Unprecedented in scale for this location, the proposal features large turbines positioned close to the shoreline, leading to serious concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and undermine its reliability as a measure of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks definitive commitments regarding turbine dimensions, layouts, or configurations, generates

considerable uncertainty. This situation precludes a consistent application of a worst-case scenario analysis and ultimately compromises the integrity of the assessment. Consequently, the impacts presented may not accurately represent the development that will be constructed, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places excessive reliance on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that environmental harm will be addressed in the future obstructs any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contravenes the fundamental aims of the Environmental Impact Assessment framework, which necessitates that significant effects and their mitigations are clearly defined prior to any determination.

There are also significant evidential gaps, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that is incompatible with statutory requirements.

As a result, the application fails to satisfy the evidential standards mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to the National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of concrete mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report not only unreliable but also incomplete. These significant deficiencies impede a lawful and comprehensive assessment of environmental effects, leaving the competent authority without the necessary information to properly evaluate the application.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is significantly lacking and fails to fulfil the statutory obligations required under the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of viable alternatives based on their environmental repercussions, the application merely outlines a narrative of the project's development. This method does not adequately illustrate that less damaging alternatives have been appropriately identified, analysed, and chosen over

more harmful options.

Furthermore, there is a notable absence of transparent, evidence-based comparisons regarding different offshore sites, scales of development, or design configurations. Specifically, the application does not show that the developer has earnestly evaluated the possibility of situating turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline, along with the crucial role that proximity to the shore plays in assessing impact, the lack of this analysis obstructs any assertion that the proposed location constitutes the least damaging choice.

This inadequacy also extends to the examination of cable routing and landfall assessments, where there is insufficient evidence indicating that alternative routes have been thoroughly considered to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation through design has not been adequately employed, relying instead on mitigation measures applied after design.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through the processes of site selection, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a comprehensive assessment of alternatives, one cannot conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly concerning the safeguarding of natural environments, cultural heritage, and community well-being. The lack of a structured and comparative assessment constitutes a significant omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, which are a European Protected Species. The application neglects to properly recognise and assess their active use of

coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction-related disturbance, noise, and increased activity have not been properly evaluated. As a result, the assessment's conclusions regarding the absence of significant effects on otters are undermined.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the actual presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A fundamental contradiction exists within the application itself; the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the

assessment and indicates that the conclusions drawn are not substantiated by the evidence provided.

The assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species that are in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

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

The deficiencies noted also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed, as it fails to acknowledge this area as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. Instead, the application employs a narrow perspective, viewing heritage merely as a collection of static assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming in this assessment is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet they are mischaracterised as static

features. This oversight neglects their continued use and the influence of development on their surroundings, leading to an inadequate evaluation of cultural effects and a disregard for their importance in community life.

Furthermore, there is a lack of assessment regarding intangible cultural heritage, such as the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These aspects are integral to the area's identity but are completely omitted from the assessment, which is a significant gap. Without acknowledging these elements, the cultural implications of the development remain improperly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to comply with established principles of participation in matters that affect cultural and environmental interests.

A critical failure of procedure 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 responsibilities to evaluate the social, cultural, and economic impacts on the island community. This omission in itself precludes a lawful determination of the proposal.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application does not provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer’s commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available to the public. This lack of transparency creates a significant evidential gap, making it impossible for both the public and the competent authority to grasp the complete range of social risks identified by the developer’s own research. The summaries that are accessible suggest that local residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, arising from direct engagement, are not speculative. However, without the full assessment being disclosed, there is no opportunity for proper scrutiny, which in turn limits the capacity to assess the significance of these findings within the decision-making framework.

Moreover, there is a clear perception that the proposal threatens community identity and cohesion, with indications of “cultural loss” appearing in the developer’s own findings. Nonetheless, these vital impacts have not been adequately incorporated into the main application nor given the necessary weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development, undermining the overall Environmental Impact Assessment process.

A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functionality. The failure to provide the complete dataset means that the application does not furnish a comprehensive evidential basis to weigh the benefits against potential harms.

From a policy standpoint, this application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must promote positive health outcomes and avoid detrimental effects; however, the available evidence suggests existing adverse impacts that remain undisclosed. Without the full assessment, there is no way to confirm compliance with this policy.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This not only impedes a lawful determination but also reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, landscape, and seascape is significantly lacking, failing to accurately capture the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon and its undeveloped nature, which contributes to a strong sense of remoteness. The planned large-scale turbines, situated close to the shoreline, would impose a continuous industrial presence, fundamentally altering this unique character and leading to a permanent transformation of the landscape.

The visual change represented in the application is not sufficiently detailed. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic locations, and popular coastal sites. This dominance would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This limitation raises the possibility that the visual impact has been understated, thus questioning the reliability of the assessment.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage adequately. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape, sharing visual and spatial connections to the Atlantic horizon. The assessment fails to consider these sites as interdependent assets, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape threatens to sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This issue is not limited to visual impacts but also encompasses broader cultural and spatial damages, which the application has not properly addressed.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural spaces and historic assets. The proposed scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further challenges any claims of policy adherence.

Ultimately, the impacts identified are not capable of being effectively mitigated. Due to the turbines' scale, height, and proximity, their presence will be dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, beyond the possibility of being lessened to acceptable levels through mitigation efforts.

In conclusion, 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 hinder a reliable evaluation and confirm that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current application presents serious deficiencies in its assessment of construction and pollution risks, failing to provide the necessary detail for a comprehensive evaluation of environmental effects. Significant seabed preparation and installation work is proposed in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated post-consent, thus hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on unspecified future measures is particularly alarming in light of the delicate receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are sensitive to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer sufficient details on how these risks will be prevented, controlled, or monitored.

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

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are established to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures before making a determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandatory that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be made. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

One of the major shortcomings of the proposal is the assumption that fishing activity can simply be displaced without repercussions. The application lacks any evidence to support the claim that alternative fishing grounds are available, accessible, or capable

of absorbing the additional pressure that displacement would cause. This oversight is crucial, as it poses a risk of overfishing in alternative areas and could have broader economic implications for the local fishing fleet. Without a comprehensive, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain obscure.

The application further jeopardises marine species, particularly due to the underwater noise expected from construction activities. The high-energy hammer piling proposed is likely to generate disturbances that extend over considerable distances, impacting species such as dolphins. Concerns are particularly raised regarding the predicted effects on a significant portion of the local bottlenose dolphin population. Despite these serious implications, the application downplays these impacts without providing adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a complete assessment of onshore infrastructure, which fails to consider the overall impacts of what is a single integrated project. The offshore turbines are intrinsically linked to the onshore works, yet these elements are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access

routes through 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 current application does not provide a thorough assessment of these impacts, limiting a full understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project are considered collectively, but the division of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately addressed.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, highlighting a gap in the evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbing peatland can release stored carbon, leading to a carbon debt that contradicts renewable energy goals. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and demonstrate protection for 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 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, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application neglects the assessment of dark skies and nocturnal wildlife, which is a significant omission from the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The importance of maintaining dark skies is particularly relevant to the area's identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts highlights a significant gap in the overall landscape and environmental assessment.

In addition, there is a critical absence of evaluation regarding the effects 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 does not provide a lighting impact assessment or a phototaxis study, resulting in an inadequate assessment of how aviation lighting might affect these species or potentially raise mortality rates.

This omission is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural areas and environmental quality. It also undermines a comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall landscape.

In summary, the absence of assessments regarding dark skies and nocturnal wildlife leads to a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts is critically inadequate, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, nearly untouched landscape, dark skies, and overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how extensive offshore infrastructure might affect visitor numbers, behaviours, or the overall economic contribution of this sector.

The tourism sector has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and a decline in environmental quality would impact the Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains unclear if the development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment inadequately considers the importance of environmental quality in supporting tourism, especially the value of pristine landscapes and dark skies to visitor experiences and burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the impacts on a recognised and flourishing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the requirement to establish net benefit. Additionally, it 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.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This hinders a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a fundamental failure to fulfil the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This proposal reflects the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, specifically the unacceptable scale of industrialisation. Despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not provide a complete or reliable evidential basis for determination.

Critical gaps in baseline data exist, compounded by the continued use of an undefined design envelope and reliance on unspecified mitigation measures. Additionally, key impact pathways, including those concerning nocturnal wildlife, full onshore

infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of likely significant effects or residual impacts.

There are evident procedural failures, including the lack of a compliant Island Communities Impact Assessment, which violates statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, failing to demonstrate protection of biodiversity, natural places, and cultural heritage. It does not show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore components has not been sufficiently assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant, with assessments concerning marine ecology, seabirds, protected species, and marine mammals being incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met. This engages the precautionary principle and precludes a lawful 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, the loss of dark skies, disruptions to cultural and visual relationships, and impacts on tourism signify permanent effects that cannot be mitigated to an acceptable level.

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

It is therefore requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I object to this going ahead for all of the above reasons.

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: 8F053F11

Member of the public 1450

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to provide a comprehensive, transparent, or dependable analysis of the potential environmental impacts of the proposal. The adoption of a flexible Project Design Envelope, which lacks a commitment to specific turbine dimensions, layouts, or configurations, introduces a substantial degree of uncertainty. This approach hinders a consistent evaluation of the worst-case scenario, undermining the assessment's integrity and obstructing both public understanding and that of the competent authority regarding the actual extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, management plans, and monitoring strategies that remain undefined. Consent is sought on the premise that any environmental harm will be managed 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 not procedurally acceptable and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated before determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions in place of site-specific evidence. Such issues result in uncertainty regarding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information impedes a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it fails to establish that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a significant shortcoming under the Environmental Impact Assessment regime. It does not offer a reasoned comparison of realistic alternatives based on their environmental effects. Instead, it merely presents a narrative of project development, lacking clarity on whether less harmful options have been adequately

identified, assessed, and chosen over more damaging solutions.

There is a notable absence of transparent analysis regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. Given the sensitivity of the West Lewis coastline and the critical nature of proximity to the shore in determining impacts, this lack of analysis undermines any conclusion that the proposed siting is the least damaging available option.

This inadequacy also extends to cable routing and landfall assessments, where there is insufficient evidence to show that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, combined with a lack of comparative analysis, suggests that mitigation by design has not been employed, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and inhibits the competent authority's ability to determine whether more appropriate and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy requirements.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, particularly within the sensitive and biologically active marine environment of West Lewis. The methodologies employed lack the depth required to capture a comprehensive understanding of species presence, behaviour, and habitat use, leading to incomplete baseline data that undermines the reliability of the evaluation of potential impacts.

A notable gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. This oversight means that critical aspects such as their core foraging range and behavioural patterns have not been appropriately considered, leaving the assessment of potential construction disturbances, noise, and increased activity unexamined. Consequently, the conclusions drawn regarding the

absence of significant effects on otters are fundamentally flawed.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodological approach risks underestimating the presence of basking sharks, especially when juxtaposed with well-established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, casting doubt on the reliability of the conclusions reached.

The shortcomings in methodology lead to conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This generates uncertainty about the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and the National Planning Framework 4, given that protected species have not been sufficiently identified or assessed. The uncertainty introduced by these deficiencies precludes the dismissal of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions fundamentally undermines the assessment's reliability. These factors obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the argument that the application fails to present a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies in the ornithological assessment, which is riddled with internal inconsistencies and lacks adequate evidence. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already declining, yet the application does not convincingly show that these species will remain unharmed. The development site is situated within key foraging areas and migratory pathways, but the assessment fails to thoroughly analyse the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer claims there will be no significant adverse effects while also proposing a Habitats Regulations derogation case. Such a case is only necessary if significant harm is anticipated, raising doubts about the reliability of the assessment and suggesting that the conclusions drawn are not backed by adequate evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds

is not fully recognised, and reliance on modelling techniques introduces uncertainty, particularly concerning species in critical decline like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor poses further risks, acting as a barrier within an essential flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term consequences of continued mortality in this corridor or the possible effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to demonstrate no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and limitations in modelling, indicates that the required standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and hampers a lawful conclusion in favour of consent.

Additionally, the identified shortcomings reflect a failure to adhere to the National Planning Framework 4, particularly regarding biodiversity protection and the conservation of natural assets. The inability to prove that internationally significant seabird populations will not be adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise this complexity. It adopts a reductive approach, treating heritage as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming lies in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mistakenly categorised as static features. This mischaracterisation fails to take into account their continued use and meaning, neglecting the impacts of development on their setting. As a result, the evaluation of cultural effects remains incomplete, overlooking their vital role in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language and traditions, which are essential to the area's identity. This omission

significantly diminishes the understanding of the cultural impact of the development. The Gaelic-speaking population, recognised as an Indigenous People, possesses distinct cultural characteristics, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment, disregarding established principles of participation in decisions affecting cultural and environmental interests.

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

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the recognition of living cultural practices, clearly departs from policy requirements. Consequently, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not provide a sufficient basis for understanding the true cultural cost of the proposal, and the cultural impacts of the development have not been adequately assessed.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the complete Social Impact Assessment raises significant concerns regarding the lawful evaluation of social impacts, health, and wellbeing. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the absence of the full report results in a critical evidential gap. This lack of transparency denies both the public and the competent authority the ability to fully comprehend the social risks highlighted in the developer’s own research.

Residents have already begun to experience measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as shown through direct engagement. These impacts are not speculative; however, the non-disclosure of the comprehensive assessment limits the capacity for proper scrutiny of the findings. As a result, the significance of these social impacts within the decision-making process remains undetermined.

Moreover, the proposal is viewed as a direct threat to the community’s identity and cohesion, with concerns over "cultural loss" emerging from the developer's findings. Despite this recognition, the application fails to incorporate these impacts adequately or assign them appropriate weight. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency severely undermines the Environmental Impact Assessment process. An extensive understanding of the social, economic, and health impacts is crucial for developments of such magnitude, especially where community character and functioning may be at stake. By omitting the full dataset, the application lacks a comprehensive evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. It is imperative for developments to foster positive health outcomes while avoiding harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without access to the complete assessment, it is impossible to confirm compliance with this essential policy.

The implications of these procedural shortcomings are profound. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This oversight constitutes a material omission within the application and fails to meet the evidential requirements dictated by the Environmental Impact Assessment framework.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This circumstance obstructs a lawful determination and underscores that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and fails to capture the scale of change and sensitivity of the receiving environment. The coastal area of West Lewis is characterised by an open Atlantic horizon, a lack of development, and a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, thereby permanently and irreversibly transforming the landscape's character.

Furthermore, the proposal does not sufficiently represent the extent of this visual alteration. Due to the size and proximity of the turbines, they would overshadow views from residential properties, historic sites, and popular coastal areas, significantly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this impact or its significance within such a sensitive landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. Available evidence indicates that these viewpoints may inadequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk suggests that the actual magnitude of visual impact may have been underestimated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and various Scheduled Monuments, are integral to a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete analysis of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering the way heritage assets are perceived and distancing them from their natural horizon. This signifies not merely a visual impact but a more profound cultural and spatial detriment that remains insufficiently assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with the National Planning Framework 4, particularly concerning the safeguarding of natural environments and historic assets. The scale of anticipated change contradicts the obligation to protect landscape character, visual amenity, and the context of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further weakens any argument of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and inescapable. As such, the resulting change is not merely significant but fundamental and permanent, beyond the capacity for reduction to an acceptable level through mitigation efforts.

In summary, the assessment falls short in accurately conveying the scale of impact, the environmental sensitivity, and the interconnected dynamics of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive 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 how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty regarding the scale and behaviour of

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

Furthermore, the lack of detailed emergency response procedures raises additional concerns. By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether appropriate safeguards are in place to respond to pollution events. This creates procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated prior to consent, and when this information is absent, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements related to 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 thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

The application further jeopardises marine species, particularly due to the underwater noise expected from construction activities. The high-energy hammer piling proposed is likely to generate disturbances that extend over considerable distances, impacting species such as dolphins. Concerns are particularly raised regarding the predicted

effects on a significant portion of the local bottlenose dolphin population. Despite these serious implications, the application downplays these impacts without providing adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure that is inadequately assessed and does not account for the comprehensive impacts of what constitutes a single integrated project. The separation of offshore turbines from onshore works leads to a disjointed evaluation, masking the true extent of environmental and socio-economic consequences.

Onshore activities encompass the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically delicate environment. The absence of a thorough assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

The deferral of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project elements; however, the disconnection between offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats, including machair systems and peatland ecosystems, which are afforded policy protection. The application fails to show that impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been put in place, highlighting a significant evidential gap in terms of biodiversity protection.

Concerns surrounding carbon balance also arise from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this issue or prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to conduct a comprehensive assessment of the entire project and to demonstrate adequate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly weakens the application.

In summary, the fragmentation of project components, the incomplete assessment, and the lack of evidence concerning environmental and land use effects render this aspect of the application unreliable and incomplete, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, fundamentally altering the night-time environment along the West Lewis coastline. This lighting creates a continuous and intrusive “wall of light” effect across the western horizon. Such alterations pose significant threats to the area's identity, which is characterised by exceptionally dark skies that contribute to environmental quality and tourism value.

A critical omission within the Environmental Impact Assessment is the failure to evaluate the effects of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This gap is significant due to the rising importance of dark skies for the area’s cultural identity and for emerging tourism sectors like astro-tourism. Furthermore, the absence of any lighting impact assessment or phototaxis study fails to address how this aviation lighting might affect nocturnal wildlife, particularly sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are prone to disorientation and increased collision risk due to artificial lighting.

Additionally, the reliance on daytime survey data in the ornithological assessment neglects to capture nocturnal activity and its associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would face adverse effects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt remains unfulfilled, invoking the precautionary principle and rendering a lawful determination impossible.

From a policy standpoint, these omissions contradict National Planning Framework 4 concerning the protection of natural places and environmental quality. They also compromise the broader assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

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

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

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

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

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent in places. The evidence presented does not meet the threshold required to eliminate adverse effects beyond reasonable

scientific doubt, thus engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

At no point do I feel meaningful and transparent consultation has been carried out with locals on this development, I do not think the plan has the interests of those that live here at heart and focuses more on the benefit of large overseas profit machines. I wholeheartedly disagree with this development, I believe that it is detrimental to our marine life, birdlife and larger well preserved landscape. Listen to those who live here, we do not want this.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E15487F5