Member of the public 1480

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment processes. The objection is informed by a review of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and rich cultural identity. Concerns arise about the scale, proximity, and design of the project in relation to statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. There is missing critical environmental data, limited and inconsistent baseline information, and undefined key elements of the proposal. The adoption of a flexible design framework obscures understanding of potential significant effects, and the proposed mitigation measures are unspecified, making their effectiveness impossible to evaluate. Consequently, the documentation does not allow for a thorough or informed assessment of environmental, cultural, or community effects, and claims of negligible or non-significant impacts lack strong evidence.

There are substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It fails to prove that it meets national standards for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests for consent and weaken the ability of the competent authority to determine the proposal's policy acceptability.

The unprecedented scale of the project in this area, with large turbines located close to the shore, raises serious concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unsuitable for a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential completeness and transparency, failing to deliver a reliable account of the proposal's likely environmental effects. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the application introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts reported may not accurately reflect the actual development, leaving both the public and the competent authority unable to comprehend the true extent of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later obstructs meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally unacceptable and stands in stark conflict with the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation measures must be clearly identified before determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that contravenes statutory requirements.

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

In summary, the 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 thorough assessment of environmental effects, thus leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development poses serious concerns regarding its impact on marine ecology and protected species within the West Lewis coastal environment, a sensitive and biologically rich area. The assessment provided is significantly lacking, as it fails to

deliver a comprehensive and reliable understanding of the ecological receptors present. The baseline data is incomplete, and the methodologies employed are insufficient to accurately capture the presence, behaviour, and habitat use of vital species.

A particularly troubling oversight is the inadequate recognition of otters, classified as a European Protected Species. The application does not appropriately assess their active utilisation of coastal areas for foraging and movement. Without a thorough consideration of their core foraging range and behavioural patterns, the potential impacts from construction-related disturbance, noise, and increased human activity remain unexamined. This gap severely undermines any assertions regarding the lack of significant effects on this species.

Moreover, the assessment of basking sharks suffers from significant shortcomings, primarily due to the reliance on aerial surveys that introduce a considerable detection bias, especially in challenging Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when juxtaposed with established land-based observations that indicate their frequent use of these waters. The omission of such pertinent data contributes to an incomplete baseline and diminishes the credibility of the findings presented.

These methodological flaws mean that any conclusions indicating negligible or non-significant effects rely more on assumptions than on substantial evidence. The insufficient baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, there is considerable uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. This level of uncertainty prevents the ability to rule out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent cannot be legally justified.

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks related to the proposal is notably deficient and lacks the necessary detail to assess potential environmental impacts. There will be significant seabed preparation and installation activities in a demanding Atlantic environment, yet the application does not provide well-defined Construction

Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that will be formulated after consent is granted, which hampers any thorough evaluation of their potential effectiveness.

This reliance on unspecified future measures raises serious concerns, particularly due to the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats, both of which are susceptible to sediment disruption and contamination. While the application acknowledges risks, such as sediment mobilisation and accidental spills, it fails to outline adequate strategies for prevention, control, or monitoring of these hazards.

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. The application mirrors the main concerns 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 prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not sufficiently address these critical issues.

There are significant gaps in the baseline data provided, and the application relies on an undefined design envelope. Furthermore, it depends on unspecified mitigation measures and fails to include essential impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism consequences. Consequently, the Environmental Impact Assessment is lacking, which hinders a full understanding of potential significant effects or residual impacts.

Procedural shortcomings are also evident, particularly with the absence of a compliant Island Communities Impact Assessment, which breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

The environmental risks associated with the proposal remain uncertain and potentially severe. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidence required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either denies consent based on these grounds or invokes the relevant regulatory provisions to require the submission of the missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

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: 9A3CE361

Member of the public 1481

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 in accordance with marine licensing and Environmental Impact Assessment requirements. The objection arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a rich cultural heritage. The magnitude, proximity, and design of the project raise serious doubts about its alignment with statutory obligations, national policies, and sustainable development principles.

Crucial environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain unclear. The proposal employs a flexible design framework, which hinders a comprehensive understanding of potential significant effects. Moreover, the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the available documentation does not allow for a thorough understanding of the environmental, cultural, or community impacts, and the assertions of negligible or insignificant effects lack solid evidence.

The application demonstrates evident policy conflicts. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It has not shown that it meets national requirements for safeguarding biodiversity, climate considerations, and environmental integrity. These conflicts are critical to the statutory tests necessary for granting consent and call into question whether the development can be deemed acceptable in policy terms.

The unprecedented scale of the proposal, with substantial turbines positioned in close proximity to the shoreline, raises significant issues regarding landscape capacity, visual impact, and environmental effects. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy requirements illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several significant deficiencies that undermine its reliability and transparency regarding the proposal's environmental effects. Notably, the application's use of a flexible Project Design Envelope lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty, thereby inhibiting a consistent application of a worst-case scenario. Such an approach compromises the integrity of the assessment and obscures the true extent of environmental impacts from both the public and the competent authority.

Furthermore, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed in the future obstructs any substantive evaluation of effectiveness or the assessment of residual impacts. The deferral of critical information to post-consent stages is procedurally unacceptable, as it contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly established prior to determination.

Additionally, the assessment suffers from substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This results in uncertainties surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information leads to an inability to fully understand cumulative and worst-case impacts and introduces scientific uncertainties that do not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, it fails to demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

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 inadequacies prevent a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is lacking and does not give a complete or trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is highly sensitive and biologically active, yet

the baseline data presented is insufficient, and the methods used do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A major gap involves otters, which are a European Protected Species. The application does not adequately recognise or evaluate their use of coastal regions for foraging and movement. Without considering their core foraging areas and behaviours, the potential effects from construction disturbances, noise, and increased activity have not been properly examined. This oversight undermines any conclusions drawn about the lack of significant effects on otters.

Additionally, there are further shortcomings in the assessment of basking sharks. The reliance on aerial surveys brings significant detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations that show these waters are used frequently. Neglecting to include or properly consider this data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based on assumptions instead of solid evidence. Furthermore, the lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks 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, as it has not properly identified or assessed protected species. The level of uncertainty brought about by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, consent cannot be lawfully granted.

In summary, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application does not have a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant internal inconsistencies and gaps in evidence that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing declines, is not adequately addressed. The application fails to meet the required evidential standard to demonstrate that these species will not be adversely affected. Furthermore, the development is situated within key foraging areas and migratory pathways, yet the evaluation does not thoroughly assess the implications of displacement, collision risk, or habitat loss.

A notable contradiction exists in the application, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only invoked when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment also lacks sufficient evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not sufficiently recognised, and reliance on modelling techniques introduces uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in cases where baseline data is incomplete and behavioural responses remain inadequately understood.

The siting of turbines within a recognised migratory corridor presents an additional and substantial risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, coupled with data deficiencies and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, preventing a lawful conclusion in favour of consent.

The identified deficiencies also indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

In conclusion, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a comprehensive evaluation of impacts and contribute to the overall finding that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal fails to adequately assess community rights and engagement, particularly concerning the Gaelic-speaking population, which embodies the characteristics of an Indigenous People. The absence of a Free, Prior and Informed Consent process significantly undermines the legitimacy of the assessment, ignoring established principles of participation essential for decisions impacting cultural and environmental interests.

Moreover, there is a critical procedural oversight in the lack of a compliant Island Communities Impact Assessment, a statutory requirement as stipulated by the Islands (Scotland) Act 2018. This deficiency hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic implications for the island community, thereby preventing a lawful determination of the proposal.

The cultural heritage assessment is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are closely interlinked. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, treating cultural assets as isolated and static entities.

Additionally, the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, is inadequate. These sites serve as active places for burial and spiritual practices but are mischaracterised as static features in the assessment. This oversight neglects their continued use and meaning, resulting in an incomplete evaluation of cultural impacts and disregarding their significance in community life.

Intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's historical relationship with the coastal environment, is also overlooked. These elements are integral to the identity of the area but are entirely absent from the assessment, creating a significant gap in understanding the cultural impact of the development.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the lack of recognition for living cultural practices, signifies a clear deviation from policy requirements.

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development remain inadequately addressed, and the application does not furnish a sound basis for evaluating the actual cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is lacking in a full and transparent assessment of social impacts, health, and wellbeing. The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the complete report has not been made public. This creates a significant evidential gap, which hampers both public understanding and the competent authority’s ability to assess the social risks identified in the developer's research.

Summaries indicate that local residents are experiencing measurable stress, anxiety,

and concern due to the proposal's scale and proximity. These impacts have been sourced from direct engagement and are therefore based on actual experiences. However, without the full assessment being available, the ability to scrutinise these findings is limited, making it difficult to understand their importance in the decision-making process.

Additionally, there is evidence suggesting that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer's findings. Yet, these impacts have not been properly considered in the main application or afforded the appropriate importance. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning could be affected. By withholding the full dataset, the application does not present a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. It must promote positive health outcomes and mitigate harm, yet the existing evidence suggests adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be shown.

The procedural implications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission is material within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The application for large-scale turbines in close proximity to the shoreline would introduce 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 does not sufficiently represent the scale of change or the sensitivity of the receiving environment.

There are significant concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially

in relation to cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

The application also fails to examine the interconnected relationships between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked to the Atlantic horizon. The assessment treats these sites as isolated entities without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

Furthermore, the industrialisation of the seascape would disrupt these relationships and alter the context in which heritage assets are experienced. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy perspective, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. The absence of a robust worst-case assessment further weakens the claim of compliance with policy requirements.

Finally, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making any change fundamentally permanent rather than reducible to an acceptable level through mitigation. Collectively, these deficiencies highlight the failure to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This results in an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail to evaluate the likely environmental effects. The application relies on future mitigation and contingency measures that are yet to be defined, precluding any meaningful assessment of their adequacy or effectiveness.

Concerns are amplified by the sensitivity of the West Lewis coastline, which 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 potential chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes

resulting from the seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, which could affect marine species and habitats already recognised as sensitive in the broader assessment.

The deficiencies extend to the absence of detailed emergency response procedures, which further complicates the evaluation process. Deferring contingency planning to a post-consent stage introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, this deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be assessed prior to consent, and without such information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements relating to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of the proposal's impact on fisheries and marine life is fundamentally inadequate, failing to deliver a thorough evaluation of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses can be preserved without significant disruption.

A crucial concern lies in the unsubstantiated assumption that fishing activities can be relocated without adverse effects. The application does not provide any evidence to suggest that alternative fishing areas are available, accessible, or capable of sustaining the added pressure. This lack of information is critical, as displacement could lead to overfishing in other regions, with potentially broader economic ramifications for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries and the livelihoods that depend on them remain unclear.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling over a prolonged period is expected to disturb marine life over extensive distances, particularly impacting species like dolphins. There are serious concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population. However, the application downplays these effects and lacks adequate supporting evidence.

Furthermore, the application reveals a troubling inconsistency by acknowledging the need for licences to permit harm to European Protected Species, while simultaneously characterising the impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, particularly in scenarios where harm is anticipated to a degree that necessitates legal authorisation.

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

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

In summary, the shortcomings regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal contradictions all contribute to an incomplete and unreliable assessment. These deficiencies obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed infrastructure is significantly deficient, failing to acknowledge the comprehensive impacts stemming from a project that is fundamentally integrated. The offshore turbines are interconnected with the onshore operations, yet the two are evaluated in isolation, leading to a disjointed understanding that masks the overall environmental and socio-economic ramifications.

The onshore components encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the development of necessary access routes through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which serves as a critical carbon repository and an ecologically fragile environment. Without an exhaustive evaluation of these impacts, a full comprehension of the project’s environmental footprint remains elusive.

Moreover, the omission or postponement of onshore impact assessments obstructs a thorough appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all facets of a project should be assessed collectively; however, the distinct treatment of offshore and onshore components results in a lack of clarity regarding the combined repercussions on peatlands, habitats, and local communities.

There are grave concerns surrounding the potential risks to sensitive habitats, including

machair systems and peatland environments that are under policy protection. The application does not sufficiently demonstrate that these impacts have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential void in relation to biodiversity safeguarding.

Additionally, the routing of infrastructure through active croft land raises possible conflicts with existing land use and legal rights. The application lacks evidence that requisite consents or processes have been pursued, bringing into question the feasibility and lawful execution of the project.

From a policy standpoint, the disjointed assessment of the project and the failure to show protection for peatlands, habitats, and land use interests contravene the principles outlined in the National Marine Plan and National Planning Framework 4. The inability to illustrate that impacts can be circumvented or mitigated further undermines the validity of the application.

Collectively, the fragmentation of project components, the absence of a thorough assessment, and the lack of supporting evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, hindering a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. It reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data are present, undermining the reliability of the evidential basis for determination. The proposal employs an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness, inhibiting a comprehensive understanding of significant effects and residual impacts.

The procedural shortcomings are also significant. The absence of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018. Moreover, the failure to provide a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues render the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural area preservation, and

cultural heritage safeguarding. It does not prove that health and wellbeing impacts are acceptable, nor does it present evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately addressed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would inflict substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism will result in permanent changes that cannot be sufficiently mitigated.

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

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

Additional Comments

I hate to see these wind farms springing up everywhere. They are unsightly and I believe they have a negative impact on our beautiful island. They have a negative impact on birds and marine life and the environment in general. They really are an eyesore, oversized and imposing on our landscape and seascapes.

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: 3F80C315

Member of the public 1482

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References: MD-00011742 & MD-00011743

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents serious deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hampers the application of a worst-case scenario assessment, which is essential for understanding the true environmental impacts. Consequently, both the public and the competent authority are left uninformed about the actual extent of these effects.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet established. This approach seeks consent based on the notion that environmental harm will be mitigated later, thus obstructing any meaningful evaluation of the measures' effectiveness or the assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental aim of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined before any determination can be made.

Moreover, the report reveals significant evidential shortcomings, with evident gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty regarding the magnitude and significance of the impacts, particularly where claims of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that cannot satisfy statutory requirements.

As a result, the application does not meet the evidential standards required by the Habitats Regulations, which aim to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially in relation to protected species and sensitive habitats. Additionally, the proposal fails to adhere to the requirements set out in National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, as it cannot substantiate that the impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks completeness and reliability in understanding the ecological receptors within the West Lewis coastal

environment. This area is known for its biological activity and sensitivity; however, the baseline data provided is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to offer a strong evidential basis for evaluating potential impacts.

A significant oversight involves otters, classified as a European Protected Species, as the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The lack of attention to their core foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This shortcoming undermines any assertions regarding the absence of significant effects on this species.

There are further deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when compared with established land-based observations that suggest frequent usage of these waters. The failure to adequately incorporate or consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria 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 introduced by these deficiencies prevents the exclusion of 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 shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species and contribute to the conclusion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant gaps in evidence and internal contradictions that weaken its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence to demonstrate that these species will not be adversely affected. The development is situated within crucial foraging areas and migratory

pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

A critical inconsistency within the application emerges as the developer asserts that no significant adverse effects are anticipated while simultaneously progressing a Habitats Regulations derogation case, which is only required if significant harm is expected. This contradiction raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been thoroughly addressed, and the reliance on modelling methods introduces uncertainty, particularly concerning species in severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in cases where baseline data is lacking and behavioural responses are not fully understood.

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

From a regulatory standpoint, the application does not meet the evidential standard required to determine that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and modelling issues, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in favour of consent. Moreover, the deficiencies noted represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These inadequacies hinder a robust evaluation of impacts and reinforce the conclusion that the application fails to meet the statutory requirements necessary for a lawful determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The procedural implications of the current application are substantial. The absence of the full Social Impact Assessment hinders the competent authority's ability to carry out a thorough socio-economic and health evaluation. This significant omission compromises the application’s compliance with the evidential requirements set forth by the Environmental Impact Assessment regime.

Furthermore, the assessment of social impacts, health, and wellbeing is notably

inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence prevents both the public and the competent authority from gaining a comprehensive understanding of the social risks highlighted by the developer's research.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts, drawn from direct engagement, are factual rather than speculative. The failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings, affecting the significance of these impacts in the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” noted within the developer’s own findings. Despite this, these impacts have not been adequately integrated into the main application or accorded the weight they warrant. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A complete understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. The application fails to provide a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development must foster positive health outcomes while avoiding harm. However, the evidence presented indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

In conclusion, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination, reinforcing the assertion 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 an undeveloped, remote character. The introduction of large-scale turbines near the shoreline would create a continuous and dominant 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, failing to adequately represent the magnitude of this visual change. The proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the naturalness and

sense of remoteness that defines this area.

There are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valued landscapes. This raises the risk that the visual impact has been understated, thereby undermining the reliability of the assessment. Additionally, the assessment neglects 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 connected to the Atlantic horizon, but the assessment treats them as isolated assets, failing to acknowledge their interdependence and resulting in an incomplete evaluation of impacts on their cultural significance and setting.

The industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been adequately assessed in the application. From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

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, rather than something that can 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, which prevents a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail, failing to provide the necessary information to evaluate potential environmental impacts. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be established after consent. This approach inhibits any meaningful assessment of their adequacy or effectiveness.

There is particular concern over this reliance on undefined future measures, especially considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats, both of which are susceptible to

sediment disturbance and contamination. While 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.

Moreover, uncertainties exist regarding the scale and behaviour of sediment plumes generated 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 encompasses potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until post-consent, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to granting consent, and when such information is absent, a lawful determination cannot be achieved. The application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of the proposed development's impact on fisheries and marine life is severely lacking, leading to significant concerns about ecological and socio-economic consequences. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not adequately demonstrate how these vital resources can be safeguarded without causing major disruptions.

A critical flaw in the application is the assumption that fishing activities can simply be displaced without any repercussions. There is no evidence presented to suggest that alternative fishing grounds exist or that they could support the additional pressure created by such displacement. This gap is crucial, as it poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and the livelihoods they support remain inadequately understood.

The proposal also raises significant risks for marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to cause disturbances across extensive areas, adversely affecting species such as dolphins. The application downplays the potential impact on a significant proportion of the local bottlenose dolphin population, raising serious concerns, yet it lacks sufficient evidence to support these minimal assessments.

Moreover, there is an evident inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to the extent that it requires legal permission.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application does not establish compliance 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 mitigate unacceptable impacts on marine biodiversity, thus preventing any assertion that the proposal aligns with sustainable development.

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions found within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in the environmental quality, cultural identity, and tourism potential of the area. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment. This aspect has not been assessed in the Environmental Impact Assessment, representing a material omission that undermines the application.

The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been evaluated. Such an omission is particularly significant given the importance of dark skies to the region's identity and to emerging sectors like astro-tourism. The failure to address these impacts results in a considerable gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are particularly affected by artificial lighting due to phototaxis, leading to disorientation and increased risks of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the resultant increase in mortality, have not been considered.

This shortcoming is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the application does not assess this risk. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. This failure also undermines the broader assessment of landscape and seascape impacts, as the night-time character is an integral component of the environment.

In summary, the lack of assessment for 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.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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 the impacts on tourism represent permanent changes that cannot be mitigated adequately.

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, along with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or invoke the necessary regulatory measures to mandate the submission of the missing information.

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

Additional Comments

I would like to object to this massive project that would definitely affect the lives of locals on the whole of the west side of Lewis in so many ways.
Not only could it affect our way of life through restricting productive fishing areas, but also will have a severe detrimental effect on the marine ecosystem. There is no doubt that with the size of this construction and the ongoing maintenance requirements, this will completely interrupt and potentially destroy the pristine marine habitats that have remained untouched and therefore protected up until now.

Having worked at sea on the west coast of Lewis for over 30 years and knowing the damage that the severe Atlantic storms can cause to coastal infrastructure, I find it difficult to believe that in the coming years, that this project would be able to be safely and properly built and maintained in the conditions that I know exist throughout the year. I believe the surveys and assessments that have been done in the proposed area are completely inadequate and will lead to a project that cannot be maintained and will end up being abandoned. I also believe the consultation of the community and the environmental assessments have been totally inadequate and therefor this proposal must be denied.

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: 5C0D0FF7

Member of the public 1483

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and its associated documentation, which reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, characterised by an Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise fundamental issues regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. It is noted that critical environmental data is absent, with baseline information being both limited and inconsistent. Key components of the proposal remain unclear, and the employment of a flexible design framework inhibits a precise understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects are unsupported by adequate evidence.

There exist pronounced and substantial conflicts with policy. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory assessments required for consent and weaken the capacity of the competent authority to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, clear, or dependable account of the likely environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This compromises the assessment's integrity, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental implications.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought with the expectation that environmental harm will be mitigated later, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be thoroughly established before determination.

There are notable evidential inadequacies, including a lack of baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where negligible or non-significant effects are concluded without substantial supporting data. The deficiency of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not meet the evidential standard set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, particularly the requirements related to biodiversity protection and environmental integrity, as it does not provide evidence that impacts have been fully assessed or that suitable safeguards are implemented.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and rigorous assessment of environmental effects, meaning that the competent authority is not positioned to make a determination based on the information supplied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is critically flawed and does not adequately reflect the ecological conditions of the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically diverse marine ecosystem, yet the available baseline data

remains incomplete. The methodologies employed in the assessment do not successfully capture vital information regarding the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a reliable evidential foundation for determining potential impacts.

Among the significant omissions is the treatment of otters, classified as a European Protected Species. The application does not sufficiently acknowledge their active foraging and movement patterns within coastal areas. The oversight regarding their core foraging range and behaviour means that the likely consequences of construction-related disturbances, noise, and increased activity are not adequately addressed. This lack of thorough assessment raises doubts about the validity of conclusions drawn regarding the absence of significant effects on this species.

Further concerns arise in the evaluation of basking sharks, particularly due to the reliance on aerial surveys which introduce substantial detection bias, particularly under Atlantic weather conditions. This method is prone to underestimating the presence of these sharks, especially when compared to established land-based observations that demonstrate their regular usage of these waters. The failure to integrate or appropriately consider such observations leads to an incomplete baseline, undermining the reliability of the conclusions drawn.

These methodological shortcomings result in assessments of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data inhibits a meaningful appraisal of cumulative and indirect impacts, as well as seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the actual risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not appropriately identified or assessed protected species. The resulting uncertainty prevents the dismissal of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these circumstances, the granting of consent cannot be justified under the law.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. These limitations obstruct a thorough evaluation of potential impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sound evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts associated with this development is fundamentally flawed. There are significant gaps in the evidence provided, as well as internal inconsistencies that undermine the validity of its conclusions. The proposal is situated within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are

already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction within the application arises from the developer's conclusion of no significant adverse effects, while simultaneously putting forth a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising questions about the reliability of the assessment and suggesting that its conclusions lack robust evidence. Furthermore, the assessment fails to adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The crucial feeding grounds associated with these species are not fully taken into account, and the reliance on modelling approaches introduces additional uncertainty, particularly concerning species that are severely declining, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds a significant risk, potentially creating a barrier in a primary flight path that is used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential standards needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and obstructs a lawful conclusion that would support consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking. It fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are interconnected. The application simplifies heritage into isolated, static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A major shortcoming is evident in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These locations are active places of burial and spiritual practice. However, the assessment categorises them as static features and does not consider their continued use or the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

The assessment also ignores intangible cultural heritage, including the Gaelic language, traditions, and the community's long-standing connection to the coastal environment. These aspects are crucial to the area's identity yet are entirely absent from the evaluation, which is a significant oversight. Without considering these elements, the true cultural impact of the development remains unclear.

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

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy viewpoint, these deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as living cultural practices, marks a clear deviation from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer 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 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 evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to appropriately capture the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large-scale turbines close to the shoreline would establish a continuous and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

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

Additionally, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and significant landscapes. This raises the possibility that the extent of visual impact has been downplayed, which undermines the reliability of the assessment.

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

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

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Therefore, the resulting change is fundamentally permanent, rather than amenable to reduction through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal includes extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent, which hampers any meaningful assessment of their sufficiency or effectiveness. This approach raises significant concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail 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 remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information precludes a lawful determination. 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 deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, which is critical given the rich marine ecosystem and vibrant fishing industry off the West Lewis coast. It fails to adequately protect or maintain these vital habitats while raising concerns about socio-economic impacts. A fundamental flaw lies in the assumption that fishing activities can be easily displaced. The application lacks evidence to show that alternative fishing grounds are both available and capable of accommodating the additional pressure, which poses a risk of overfishing elsewhere

and could have detrimental effects on local livelihoods.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated from construction activities. The anticipated long-duration hammer piling is expected to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to minimise the importance of these disturbances, offering insufficient evidence to support its claims.

In a troubling contradiction, the application acknowledges the necessity for licences to allow for potential harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This inconsistency casts doubt on the assessment's credibility and raises alarms regarding compliance with the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Additionally, the assessment does not account for the cumulative impacts from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined factors, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

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

In summary, the deficiencies in the assessment regarding fishing displacement, underappreciation of acoustic impacts, and internal contradictions render the evaluation incomplete and unreliable, hindering a thorough understanding of the potential repercussions on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development encompasses both offshore turbines and onshore infrastructure, which are inherently interconnected. However, the current assessment fails to consider them as a single integrated project, leading to a fragmented analysis that does not accurately reflect the comprehensive environmental and socio-economic impacts. The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and a habitat of ecological sensitivity. The application does not deliver a thorough evaluation of these impacts, thus hindering an understanding of the overall environmental footprint of the project.

Moreover, the application’s exclusion or postponement of the assessment of onshore

impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the distinct assessments of offshore and onshore elements result in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities. There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are safeguarded by policy. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, thereby creating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as disturbances to peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable. Furthermore, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been initiated, which raises issues concerning both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project in its entirety and to ensure the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further compromises the credibility of the application. Collectively, the disjointed assessment of project components, the lack of a thorough evaluation, and the absence of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the role of dark skies in the area’s identity and the potential growth of astro-tourism. The lack of consideration for these impacts creates a notable gap in the overall landscape and environmental assessment.

Furthermore, the proposal does not assess the effects of artificial lighting on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are at risk of disorientation and collision due to phototaxis, yet the application omits any lighting impact assessment or phototaxis study. This means there

is no analysis of how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, also face the risk of disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. This failure also undermines the overall assessment of landscape and seascape impacts, as night-time character is a vital component of the environment.

In summary, the complete absence of assessments concerning dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit to support a lawful determination.

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having risen from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this growth, the application fails to adequately assess how large-scale offshore infrastructure could alter visitor numbers, behaviour, or the overall economic contribution, leaving a critical gap in understanding the potential implications for this key sector.

Tourism relies heavily on the natural attributes of the area, including its wild coastline, near-pristine landscape, dark skies, and a sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery; however, it provides no quantified analysis regarding the impact of potential industrialisation on the environmental quality that draws these visitors. The omission of an assessment addressing environmental quality, particularly concerning unspoiled landscapes and dark skies, is significant, especially as these factors are vital to the visitor experience and to emerging markets like nature-based tourism and astro-tourism.

In addition to the economic factors, the failure to conduct a compliant Island Communities Impact Assessment means that the vulnerabilities of the local economy have not been evaluated as mandated by the Islands (Scotland) Act 2018. This oversight has broader implications for community sustainability, local businesses, and employment opportunities within an island community that has limited economic

diversification.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding the need to establish net economic benefit and the strategic priority placed on tourism as a growth sector. Without sufficient evidence to allow the competent authority to fully assess the economic consequences of the proposal, there exists a significant evidential gap.

Overall, the combined shortcomings in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and acknowledging the island's economic dependency lead to an incomplete application that hinders a thorough evaluation of its economic effects.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It presents issues similar to those that caused the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still fails to address these crucial aspects.

The application lacks a thorough and reliable basis for determination. There are significant gaps in the baseline data, and it continues to employ an undefined design envelope. Additionally, it relies on unspecified mitigation measures and overlooks key impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of potential significant effects and residual impacts.

There are notable procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a significant omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been properly evaluated, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. The assessments related to marine ecology, seabirds, protected species, and marine mammals are

incomplete and inconsistent in certain areas. The evidential threshold required to prove that adverse effects are excluded beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and making it impossible to legally conclude that impacts are acceptable.

The proposal would bring about considerable and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and have impacts on tourism, leading to permanent effects that cannot be mitigated to an acceptable level.

Overall, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, makes it impossible to reach 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: 5224BF01

Member of the public 1484

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and its associated documentation, which reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, characterised by an Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise fundamental issues regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. It is noted that critical environmental data is absent, with baseline information being both limited and inconsistent. Key components of the proposal remain unclear, and the employment of a flexible design framework inhibits a precise understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects are unsupported by adequate evidence.

There exist pronounced and substantial conflicts with policy. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory assessments required for consent and weaken the capacity of the competent authority to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, clear, or dependable account of the likely environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This compromises the assessment's integrity, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental implications.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought with the expectation that environmental harm will be mitigated later, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be thoroughly established before determination.

There are notable evidential inadequacies, including a lack of baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where negligible or non-significant effects are concluded without substantial supporting data. The deficiency of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not meet the evidential standard set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, particularly the requirements related to biodiversity protection and environmental integrity, as it does not provide evidence that impacts have been fully assessed or that suitable safeguards are implemented.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and rigorous assessment of environmental effects, meaning that the competent authority is not positioned to make a determination based on the information supplied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is critically flawed and does not adequately reflect the ecological conditions of the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically diverse marine ecosystem, yet the available baseline data

remains incomplete. The methodologies employed in the assessment do not successfully capture vital information regarding the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a reliable evidential foundation for determining potential impacts.

Among the significant omissions is the treatment of otters, classified as a European Protected Species. The application does not sufficiently acknowledge their active foraging and movement patterns within coastal areas. The oversight regarding their core foraging range and behaviour means that the likely consequences of construction-related disturbances, noise, and increased activity are not adequately addressed. This lack of thorough assessment raises doubts about the validity of conclusions drawn regarding the absence of significant effects on this species.

Further concerns arise in the evaluation of basking sharks, particularly due to the reliance on aerial surveys which introduce substantial detection bias, particularly under Atlantic weather conditions. This method is prone to underestimating the presence of these sharks, especially when compared to established land-based observations that demonstrate their regular usage of these waters. The failure to integrate or appropriately consider such observations leads to an incomplete baseline, undermining the reliability of the conclusions drawn.

These methodological shortcomings result in assessments of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data inhibits a meaningful appraisal of cumulative and indirect impacts, as well as seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the actual risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not appropriately identified or assessed protected species. The resulting uncertainty prevents the dismissal of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these circumstances, the granting of consent cannot be justified under the law.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. These limitations obstruct a thorough evaluation of potential impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sound evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts associated with this development is fundamentally flawed. There are significant gaps in the evidence provided, as well as internal inconsistencies that undermine the validity of its conclusions. The proposal is situated within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are

already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction within the application arises from the developer's conclusion of no significant adverse effects, while simultaneously putting forth a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising questions about the reliability of the assessment and suggesting that its conclusions lack robust evidence. Furthermore, the assessment fails to adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The crucial feeding grounds associated with these species are not fully taken into account, and the reliance on modelling approaches introduces additional uncertainty, particularly concerning species that are severely declining, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds a significant risk, potentially creating a barrier in a primary flight path that is used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential standards needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and obstructs a lawful conclusion that would support consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking. It fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are interconnected. The application simplifies heritage into isolated, static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A major shortcoming is evident in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These locations are active places of burial and spiritual practice. However, the assessment categorises them as static features and does not consider their continued use or the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

The assessment also ignores intangible cultural heritage, including the Gaelic language, traditions, and the community's long-standing connection to the coastal environment. These aspects are crucial to the area's identity yet are entirely absent from the evaluation, which is a significant oversight. Without considering these elements, the true cultural impact of the development remains unclear.

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

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy viewpoint, these deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as living cultural practices, marks a clear deviation from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer 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 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 evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to appropriately capture the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large-scale turbines close to the shoreline would establish a continuous and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

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

Additionally, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and significant landscapes. This raises the possibility that the extent of visual impact has been downplayed, which undermines the reliability of the assessment.

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

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

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Therefore, the resulting change is fundamentally permanent, rather than amenable to reduction through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal includes extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent, which hampers any meaningful assessment of their sufficiency or effectiveness. This approach raises significant concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail 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 remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information precludes a lawful determination. 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 deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, which is critical given the rich marine ecosystem and vibrant fishing industry off the West Lewis coast. It fails to adequately protect or maintain these vital habitats while raising concerns about socio-economic impacts. A fundamental flaw lies in the assumption that fishing activities can be easily displaced. The application lacks evidence to show that alternative fishing grounds are both available and capable of accommodating the additional pressure, which poses a risk of overfishing elsewhere

and could have detrimental effects on local livelihoods.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated from construction activities. The anticipated long-duration hammer piling is expected to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to minimise the importance of these disturbances, offering insufficient evidence to support its claims.

In a troubling contradiction, the application acknowledges the necessity for licences to allow for potential harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This inconsistency casts doubt on the assessment's credibility and raises alarms regarding compliance with the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Additionally, the assessment does not account for the cumulative impacts from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined factors, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

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

In summary, the deficiencies in the assessment regarding fishing displacement, underappreciation of acoustic impacts, and internal contradictions render the evaluation incomplete and unreliable, hindering a thorough understanding of the potential repercussions on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development encompasses both offshore turbines and onshore infrastructure, which are inherently interconnected. However, the current assessment fails to consider them as a single integrated project, leading to a fragmented analysis that does not accurately reflect the comprehensive environmental and socio-economic impacts. The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and a habitat of ecological sensitivity. The application does not deliver a thorough evaluation of these impacts, thus hindering an understanding of the overall environmental footprint of the project.

Moreover, the application’s exclusion or postponement of the assessment of onshore

impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the distinct assessments of offshore and onshore elements result in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities. There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are safeguarded by policy. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, thereby creating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as disturbances to peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable. Furthermore, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been initiated, which raises issues concerning both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project in its entirety and to ensure the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further compromises the credibility of the application. Collectively, the disjointed assessment of project components, the lack of a thorough evaluation, and the absence of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the role of dark skies in the area’s identity and the potential growth of astro-tourism. The lack of consideration for these impacts creates a notable gap in the overall landscape and environmental assessment.

Furthermore, the proposal does not assess the effects of artificial lighting on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are at risk of disorientation and collision due to phototaxis, yet the application omits any lighting impact assessment or phototaxis study. This means there

is no analysis of how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, also face the risk of disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. This failure also undermines the overall assessment of landscape and seascape impacts, as night-time character is a vital component of the environment.

In summary, the complete absence of assessments concerning dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit to support a lawful determination.

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having risen from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this growth, the application fails to adequately assess how large-scale offshore infrastructure could alter visitor numbers, behaviour, or the overall economic contribution, leaving a critical gap in understanding the potential implications for this key sector.

Tourism relies heavily on the natural attributes of the area, including its wild coastline, near-pristine landscape, dark skies, and a sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery; however, it provides no quantified analysis regarding the impact of potential industrialisation on the environmental quality that draws these visitors. The omission of an assessment addressing environmental quality, particularly concerning unspoiled landscapes and dark skies, is significant, especially as these factors are vital to the visitor experience and to emerging markets like nature-based tourism and astro-tourism.

In addition to the economic factors, the failure to conduct a compliant Island Communities Impact Assessment means that the vulnerabilities of the local economy have not been evaluated as mandated by the Islands (Scotland) Act 2018. This oversight has broader implications for community sustainability, local businesses, and employment opportunities within an island community that has limited economic

diversification.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding the need to establish net economic benefit and the strategic priority placed on tourism as a growth sector. Without sufficient evidence to allow the competent authority to fully assess the economic consequences of the proposal, there exists a significant evidential gap.

Overall, the combined shortcomings in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and acknowledging the island's economic dependency lead to an incomplete application that hinders a thorough evaluation of its economic effects.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It presents issues similar to those that caused the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still fails to address these crucial aspects.

The application lacks a thorough and reliable basis for determination. There are significant gaps in the baseline data, and it continues to employ an undefined design envelope. Additionally, it relies on unspecified mitigation measures and overlooks key impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of potential significant effects and residual impacts.

There are notable procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a significant omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been properly evaluated, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. The assessments related to marine ecology, seabirds, protected species, and marine mammals are

incomplete and inconsistent in certain areas. The evidential threshold required to prove that adverse effects are excluded beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and making it impossible to legally conclude that impacts are acceptable.

The proposal would bring about considerable and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and have impacts on tourism, leading to permanent effects that cannot be mitigated to an acceptable level.

Overall, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, makes it impossible to reach 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: 5224BF01

Member of the public 1485

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. It arises from an examination of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies related to planning, environmental, cultural, and procedural matters. The development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles are raised due to its scale, proximity, and design.

The application lacks an adequate evidential basis for a lawful determination. Essential environmental data is missing, and the baseline information presented is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined, and the use of a flexible design framework complicates the understanding of potential significant effects. The reliance on unspecified mitigation measures hampers the ability to assess their effectiveness, resulting in insufficient documentation for a full understanding of environmental, cultural, or community impacts. As such, claims regarding negligible or non-significant effects are unsupported by robust evidence.

Policy conflicts are apparent and significant. 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. There is a failure to demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and impede the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned close to the shoreline, raises serious issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence 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 concerns, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to present a complete, clear, or trustworthy account of the potential environmental effects of the

proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and means that the impacts outlined may not accurately reflect the final development. As a result, both the public and the competent authority lack a true understanding of the environmental effects.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. This means that consent is being sought on the premise that environmental harm will be mitigated later, hindering a proper evaluation of effectiveness or assessment of remaining impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aim of the Environmental Impact Assessment process, which requires that likely significant effects and mitigation measures are clearly defined before any decision is made.

There are critical gaps in evidence, including deficiencies in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be aligned with statutory requirements.

Consequently, the application does not meet the evidential standards needed under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it cannot prove that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to adequately meet the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. There is a significant deficiency in the assessment of marine ecology and protected species, which provides an unreliable understanding of ecological receptors within the sensitive West Lewis coastal environment. The methodologies used are inadequate and do not sufficiently capture crucial aspects of species presence, behaviour, and habitat use, thereby undermining the evidential basis for evaluating potential impacts.

One critical shortcoming is the treatment of otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential effects from construction disturbance, noise, and increased activity. Such omissions raise significant doubts about the conclusions drawn regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks suffers from methodological flaws, notably the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider these observations leads to an incomplete baseline and undermines 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 rather than robust evidence. Furthermore, the lack of sufficient baseline data hinders any meaningful assessment of cumulative and indirect impacts, including variations over seasons and interactions within the wider ecosystem. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

When considering these factors, the overall assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies prevent a thorough evaluation of impacts on marine ecology and protected species, contributing to the conclusion that the application lacks a solid evidential foundation. In light of the uncertainties introduced, consent for the application cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises serious concerns regarding its reliability due to various methodological weaknesses and significant gaps in evidence. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. The application fails to adequately demonstrate that these species will remain unaffected, particularly given that the development is situated within crucial foraging areas and migratory pathways. Furthermore, the assessment does not thoroughly consider the risks associated with displacement, collision, or habitat loss.

A major inconsistency within the application is evident, as the developer asserts there will be no significant adverse effects while concurrently making a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction casts doubt on the validity of the assessment and suggests that the conclusions drawn are not substantiated by adequate evidence.

The methodologies employed are problematic; they may underestimate mortality rates, especially given the lack of complete baseline data and an insufficient understanding of the behavioural responses of species such as Kittiwakes and Fulmars, which are already facing severe decline. The assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The importance of these feeding grounds is not sufficiently acknowledged, and reliance on modelling introduces further uncertainty.

Additionally, the proposed siting of turbines within a recognised migratory corridor poses a significant risk by potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately evaluate the long-term consequences of potential sustained mortality in this corridor, along with the impact on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the necessary evidential threshold to affirm that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and limitations in modelling, means the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and renders any conclusion in support of consent unlawful.

Overall, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected directly contradicts national policy. Collectively, these issues render the assessment unreliable, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, viewing heritage merely as a collection of disconnected, static entities instead of recognising their ongoing social, cultural, and spiritual relevance to the community.

The assessment significantly underrepresents culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which remain active sites for burial and spiritual practices. Instead of acknowledging their ongoing use and significance, the assessment inaccurately categorises them as static features, overlooking how development may impact their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural repercussions and fails to appreciate their importance in community life.

Additionally, there is a striking omission in addressing intangible cultural heritage,

which encompasses the Gaelic language, traditional practices, and the long-standing bond between the community and the coastal environment. These aspects are vital to the area's identity yet are entirely absent from the evaluation, representing a major oversight. Without incorporating these factors, the development's cultural impacts cannot be adequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as having a distinct cultural identity akin to Indigenous Peoples, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles for participation in decisions affecting cultural and environmental matters.

A significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligations to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in clear opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices demonstrates a clear deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and compliance with statutory requirements results in a significant gap in evidence. The cultural impacts of the proposed development have not been thoroughly assessed, and the application lacks a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal has been met with significant concern due to the evident deficiencies in the assessment of social impacts, health, and wellbeing. While the developer did commission a Social Impact Assessment that involved focus groups with local residents, the absence of the full report raises substantial issues. This lack of transparency creates a notable evidential gap, hindering both the public and the competent authority from fully grasping the extent of social risks identified in the developer's own research.

Summaries provided reveal that residents are currently facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These findings stem from direct engagement, indicating that the impacts are concrete rather than speculative. However, without access to the complete assessment, it is impossible to scrutinise these findings properly or evaluate their significance in the decision-making process.

Furthermore, there is a clear perception that the proposal threatens community identity and cohesion, with "cultural loss" cited in the developer's findings. Regrettably, these serious impacts have not been adequately considered in the main application, nor have they been assigned the appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not present a sound evidential basis necessary to weigh benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm; however, the evidence available suggests that existing adverse effects have not been fully disclosed. Without the full assessment, it cannot be shown that the proposal complies with this policy.

The procedural ramifications are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This undermines the possibility of a lawful determination and confirms 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 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 likely environmental effects. The application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline features 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 accidental chemical or oil spills, it fails to offer sufficient detail on how these risks will be prevented, controlled, or monitored.

Furthermore, 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 potential effects on marine species and habitats identified as sensitive within the broader assessment.

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

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation be assessed prior to consent, and the lack of such information renders a lawful determination impossible. 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 regarding potential impacts collectively render the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal introduces substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across significant distances, with concerns specifically raised about the local bottlenose dolphin population. The application appears to downplay the severity of these effects, lacking sufficient supporting evidence to justify this minimisation.

Furthermore, the assessment of fisheries and marine life is inadequate and does not offer a comprehensive evaluation of the ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to demonstrate how these

uses and habitats can be protected or maintained without substantial disruption.

A critical issue lies in the assumption that fishing activity can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This lack of information is troubling, as it raises the risk of overfishing in other areas and may lead to wider economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods cannot be properly understood.

There is also a notable inconsistency within the application. While the need for licences to permit harm to European Protected Species is acknowledged, impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a level that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is crucial; otherwise, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies contribute to an incomplete and unreliable assessment. These shortcomings hinder a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally flawed and does not account for the complete range of impacts associated with what constitutes a single integrated project. The interconnected nature of the offshore turbines and the onshore works has resulted in a fragmented evaluation, obscuring the true extent of the environmental and socio-economic effects.

The elements onshore include cabling that will traverse protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that passes through sensitive landscapes. Notably, these developments involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application falls short of

providing a thorough assessment of these impacts, leading to an incomplete understanding of the project's overall environmental footprint.

By neglecting to assess the onshore impacts adequately, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered together. However, the disconnection between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully articulated.

Moreover, there are considerable risks posed to sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. The application fails to illustrate that impacts on these habitats have been thoroughly evaluated or that appropriate measures to avoid harm have been instituted. This creates a significant evidential gap concerning biodiversity protection.

Concerns are also raised regarding the carbon balance associated with the proposal. The disturbance of peatland has the potential to release stored carbon, which may lead to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land poses possible conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or processes have been initiated, which brings the deliverability and lawful implementation into question.

From a policy standpoint, the inability to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The lack of demonstration regarding the avoidance or mitigation of impacts further weakens the application.

In summary, the separation of project components, the absence of an all-encompassing assessment, and the lack of evidence concerning environmental and land use impacts result in this aspect of the application being incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

There is no evaluation of how this lighting might impact visual amenity, landscape

character, or the experience of both residents and visitors. This is particularly concerning given the value of dark skies to the local identity and the emerging sectors of tourism like astro-tourism. The lack of consideration for these effects results in a clear deficiency in the overall landscape and environmental assessment.

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

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

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

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

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

TOURISM

The application acknowledges that a substantial 86% of visitors are attracted to the Isle of Lewis due to its stunning scenery, yet it lacks a detailed assessment of how large-scale offshore infrastructure could influence visitor numbers and overall economic contributions. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness, which all play a critical role in the visitor experience. The absence of a thorough analysis raises serious concerns about the potential economic and social repercussions for this vital sector.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the implications of the

industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise an already thriving sector.

Moreover, the importance of environmental quality in sustaining tourism has been overlooked. The significance of unspoiled landscapes and dark skies cannot be underestimated, particularly regarding emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a substantial gap in understanding the impacts on this growing facet of the local economy.

Given the limited economic diversification of this island community, neglecting the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the necessity to provide evidence of net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its failure to meet the requirements of sustainable development, as assessed against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Now, despite being put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it falls short of the necessary standards.

The evidential basis for determining this application is incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and the reliance on unspecified mitigation measures is problematic. Additionally, it overlooks essential impact pathways, including those concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are evident throughout the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties set forth in the Islands (Scotland) Act 2018. Furthermore, the omission of the full Social Impact Assessment constitutes a material failure. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural spaces, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. There is also a lack of evidence for a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in various areas. The evidential requirements needed to exclude adverse effects beyond reasonable scientific doubt have not been satisfied, necessitating the application of the precautionary principle, which prevents a lawful determination that impacts are acceptable.

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

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

In light of these considerations, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Additional Comments

I have a young family. I am not in favour of this windfarm. I object strongly to this proposal.

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: 922F6D8F

Member of the public 1486

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the proposal's scale, proximity, and design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Substantial conflicts with policy are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development as policy-compliant.

The unprecedented scale of the proposal raises significant concerns, with large turbines planned in close proximity to the shoreline, leading to issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In this context, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. It does not deliver a complete or reliable understanding of the ecological receptors in this area. The baseline data remains incomplete, and the methodologies employed fail to adequately capture the presence, behaviour, and habitat use of

various species. Consequently, the assessment lacks a solid evidential basis for evaluating the potential impacts.

There is a significant omission concerning otters, which are classified as a European Protected Species. The application does not appropriately acknowledge or assess their active use of coastal regions for foraging and movement. This disregard for their core foraging range and behavioural patterns results in an inadequate assessment of potential effects stemming from construction disturbances, noise, and increased activity. Such shortcomings undermine any conclusions related to the absence of significant effects on this species.

Further issues emerge regarding the assessment of basking sharks, where reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological inadequacies lead to conclusions of negligible or non-significant effects that are founded on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is significantly flawed, with substantial gaps in evidence and inconsistencies that compromise its conclusions. This region of 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. Key foraging areas and migratory pathways are located within the development site, yet the assessment falls short in evaluating the implications of potential displacement,

collision risks, or habitat loss.

Moreover, there is a fundamental contradiction in the application, where the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence available.

The evidence provided does not sufficiently show that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unharmed. The importance of these feeding grounds is inadequately acknowledged, and reliance on modelling techniques introduces further uncertainty, especially for severely declining species such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in the face of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines in a recognised migratory corridor presents a significant risk by creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to properly assess the long-term consequences of sustained mortality in this corridor or consider the potential impact on species with relatively small global populations.

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

In addition, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

All these factors combined render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements needed for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is deeply flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interwoven. The application simplifies heritage to isolated, static assets, neglecting their active social, cultural, and spiritual roles within the community.

A significant oversight is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they serve as active sites of burial and spiritual practice. The assessment overlooks their ongoing use and significance, leading to a distorted understanding of the cultural effects and ignoring their importance in community life.

Moreover, there is a glaring omission regarding intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and its coastal environment. These crucial elements, central to the area's identity, are not considered in the assessment, which hampers a proper understanding of the development's cultural impact.

Concerns extend to community rights and engagement. The Gaelic-speaking population, with its unique cultural identity acknowledged as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful participation undermines the assessment's credibility and fails to comply with established principles regarding community involvement in decisions impacting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, represents a critical procedural failure. This omission prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings conflict with the requirements of the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the dismissal of living cultural practices, marks a significant deviation from policy mandates.

Collectively, the failure to evaluate living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, resulting in the application lacking a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing related to the proposal is insufficient and lacks necessary transparency. While the developer conducted a Social Impact Assessment, including focus groups with local residents, the complete report has not been made public. This results in a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of social risks identified by the developer's research.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts arise from direct engagement with the community and are not merely speculative. However, without disclosing the complete assessment, proper scrutiny of the findings is not possible, which limits the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer's findings. Unfortunately, these effects have not been fully considered in the main application or given the appropriate weight they deserve. 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 undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when the character and functioning of the community may be at stake. By failing to provide the complete dataset, the application does not offer a comprehensive evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, but the available evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The implications of these procedural shortcomings are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material failure within the application and does not meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment inadequate and unreliable. This lack of comprehensive information hinders a lawful determination, reinforcing the conclusion that the application does not rest on sufficient evidence.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking. It does not provide enough detail to understand the likely environmental effects. The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be created after consent, which hinders any proper evaluation of their adequacy or effectiveness.

This dependence on unspecified future measures raises concerns, especially given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. While the application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient information on how these risks will be prevented, controlled, or monitored.

There is uncertainty about the size and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without reliable modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application limits the ability to evaluate whether adequate measures are in place to respond to pollution events. This 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 postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent is granted, and without this information, a lawful determination cannot be achieved. The application also does not show compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks and strengthen the view that the application is 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 incomplete assessment of onshore infrastructure undermines the understanding of the full extent of impacts associated with this integrated project. Although the offshore turbines and onshore works are intrinsically linked, they have been evaluated separately, which obscures the true scale of the environmental and socio-economic consequences. The lack of a comprehensive assessment means that the cumulative effects on sensitive habitats, peatlands, and local communities remain unclear.

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

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

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

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

From a policy standpoint, the failure to consider the project as a whole, alongside the lack of demonstrated protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be mitigated or avoided significantly weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination. From a policy standpoint, these omissions are inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, this failure undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological context.

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

TOURISM

The assessment of tourism impacts is significantly inadequate, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which is heavily reliant on these qualities. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, sustaining more than 1,000 jobs and accounting for as much as 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and broader economic resilience. Without such analysis, it remains impossible to determine whether the development would yield a net economic benefit or threaten an established and expanding sector.

The assessment also overlooks the crucial role of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on a recognised and growing part of the local economy.

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

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

Collectively, these failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependencies culminate in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development, particularly when measured against statutory duties, national policy, and evidential standards. It mirrors the issues identified in the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more rigorous policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical concern is the inadequacy of the evidential basis provided for evaluation. There are notable gaps in baseline data, and the continued use of an undefined design envelope is problematic. The application relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete and does not facilitate a full understanding of significant effects or residual impacts.

There are procedural shortcomings as well. The failure to include a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a significant shortcoming. These failures hinder the competent authority

from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal contradicts the principles set out in National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural spaces, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Furthermore, the absence of tourism impact modelling means there is no substantiated claim of a net economic benefit. The cumulative impact of both offshore and onshore elements has not been assessed appropriately, leaving gaps in understanding the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potential significance surround the environmental risks associated with this proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard necessary to rule out adverse effects with reasonable scientific certainty has not been achieved, thus invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to profound and irreversible alterations to a delicate landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism represent enduring impacts that cannot be adequately mitigated.

In conclusion, the combination of procedural and substantive deficiencies renders the application unfit for determination. The extensive information gaps, policy conflicts, and unresolved environmental risks preclude a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent for this application or exercises the relevant regulatory provisions to mandate the submission of the necessary information.

Consequently, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

I am raging about this and do not agree with the proposed N4. I object in the strongest possible terms.

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: 445ECA75

Member of the public 1487

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an examination of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for lawful determination. It suffers from significant omissions in critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures precludes an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly pertinent concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate adherence to national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the proposal’s acceptability within policy frameworks.

The unprecedented scale of the proposal, featuring large turbines 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 weaknesses, and clear policy non-compliance collectively indicates that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies and fails to offer a complete, transparent, or reliable account of the expected environmental consequences of the proposal. The flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of precision hinders a consistent worst-case scenario application, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, which obstructs both the public's and the competent authority's understanding of the true environmental effects.

Moreover, the application relies extensively on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be addressed later prevents any meaningful evaluation of these measures' effectiveness or a proper assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's intent, which necessitates that significant likely effects and mitigation strategies are established prior to determination.

The report is also marked by significant evidential deficiencies, including gaps in baseline data and limitations in methodology, along with a reliance on assumptions instead of site-specific evidence. Such shortcomings create uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without strong supporting data. Insufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that are incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies inhibit a lawful and robust assessment of environmental effects, meaning that the competent authority cannot determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is characterised as a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of the ecological receptors present. The methodologies employed do

not adequately capture species presence, behaviour, or habitat use, leading to an incomplete baseline data set that undermines the evidential basis for evaluating impacts.

One notable shortcoming is the failure to properly assess otters, a European Protected Species. The application neglects to recognise their active use of coastal areas for foraging and movement. Consequently, the assessment does not address their core foraging range or behavioural patterns, resulting in an insufficient evaluation of potential effects from construction disturbance, noise, and increased activity. This lack of consideration undermines any claims regarding the absence of significant effects on this species.

Additionally, there are critical deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. Established land-based observations indicate frequent usage of these waters, yet such data has not been adequately incorporated or considered. The methodological limitations inherent in the assessment mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the absence of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty around the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these circumstances, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These shortcomings impede a thorough 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 west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the development fails to convincingly demonstrate that these species will not be adversely affected, despite the crucial location within key foraging areas and migratory pathways. It does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss, resulting in significant gaps in evidence and internal inconsistencies that undermine its conclusions.

A critical contradiction exists within the application, as the developer concludes that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is expected, which raises doubts about the reliability of the assessment and indicates that the conclusions reached are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient evidence to assure 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 thoroughly considered, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and the behavioural responses of the birds are not fully understood.

The siting of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with small global populations considered.

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in the modelling approach, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and prevents a lawful conclusion in support 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 demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development application significantly underestimates the importance of cultural heritage and community identity along the West Lewis coastline, neglecting to recognise it as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. It adopts a simplistic view, regarding heritage merely as a collection of separate, static features, while failing to appreciate their vital social, cultural, and spiritual roles 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 serve as active places

for burial and spiritual rituals, yet they are described in the assessment as fixed elements, overlooking their ongoing significance, usage, and the potential repercussions of development on their surroundings. This incorrect categorisation leads to an inadequate evaluation of cultural implications and neglects their integral role in community existence.

Moreover, the assessment does not account for intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely omitted from the evaluation, which represents a considerable gap. Without incorporating these aspects, the cultural consequences of the development cannot be accurately assessed.

Concerns also arise regarding the rights of the community and their engagement in this process. The Gaelic-speaking population, embodying distinct cultural characteristics akin to those of an Indigenous People, has not been afforded the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the credibility of the assessment and fails to adhere to established participation principles regarding decisions that influence cultural and environmental matters.

A crucial procedural flaw lies in the absence of a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. Without this necessary evaluation, the competent authority is unable to meet its legal obligations to assess the social, cultural, and economic effects on the island community. This omission, in itself, renders the determination of the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially concerning the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, as well as to recognise ongoing cultural practices, clearly contravenes policy requirements.

In summary, the failure to evaluate living heritage, intangible cultural values, community rights, and necessary statutory assessments culminates in a substantial evidential void. The cultural effects of the development have not been adequately appraised, and the application falls short in providing a foundation for understanding the true cultural implications of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been fully disclosed. This non-disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer’s own research.

Available summaries indicate that residents are currently facing measurable levels of

stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been confirmed through direct engagement rather than speculation. However, the failure to provide the complete assessment stifles proper scrutiny of the findings and limits the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer's own findings. Despite the acknowledgment of these impacts, they have not been adequately incorporated into the main application or afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is imperative for developments of this magnitude, particularly when community character and functioning may be jeopardised. By withholding the full dataset, the application does not provide a complete evidential basis for weighing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence currently available reveals existing adverse effects that have not been fully articulated. Without the complete assessment, compliance with this policy remains unproven.

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

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment insufficient and unreliable. This situation impedes lawful determination and supports the assertion that the application lacks the necessary information for adequate evaluation.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped character. This development would create a dominant industrial presence that would fundamentally alter the area's existing character, resulting in a permanent transformation of the landscape that cannot be mitigated.

The assessment of seascape, landscape, and visual impacts is significantly deficient,

failing to adequately convey the scale of visual change anticipated. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and coastal locations frequently used by the public. This alteration would directly impact visual amenity and diminish the natural qualities that define the area. Furthermore, the assessment does not reflect the significance of these impacts in relation to the sensitive landscape.

Methodological issues are also apparent in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the assessment has underestimated the magnitude of visual impact, thereby compromising its reliability.

Additionally, the assessment neglects to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. The current assessment treats these sites as isolated entities, failing to acknowledge their interdependence and thereby resulting in an incomplete evaluation of the impacts on their cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This change represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately assessed within the proposal.

From a policy standpoint, the proposed development conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change presented is incompatible with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment weakens any assertions of compliance with policy guidelines.

The impacts identified are clearly not capable of effective mitigation. Due to the height, scale, and proximity of the turbines, their presence would be unavoidable and dominant. Thus, the resulting change to the landscape is not merely significant; it is fundamental and permanent.

In conclusion, the assessment fails to accurately represent the scale of impact, the environmental sensitivity, and the interrelated nature of landscape and heritage. These deficiencies inhibit a reliable evaluation and affirm that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application lacks sufficient detail to assess construction and pollution risks adequately. It involves significant seabed preparation and installation works in a high-energy Atlantic environment but does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that will only be prepared after consent, which undermines the ability to evaluate their adequacy or effectiveness.

This reliance on undefined future measures is particularly worrying given the sensitivity of the environment. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not provide enough information on how these risks will be prevented, controlled, or monitored. There is also uncertainty about the scale and behaviour of sediment plumes from seabed disturbance and cable installation. Without comprehensive modelling and clear management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, which extends to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application does not allow for an evaluation of whether proper safeguards are in place to address pollution events. This approach creates procedural risk and weakens the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and if this information is missing, a lawful determination cannot occur. Additionally, the application fails to show compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to offer a robust evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these uses and habitats can be safeguarded or maintained without considerable disruption.

A critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to confirm that alternative fishing grounds are not only available but also accessible and capable of bearing additional pressures. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. Consequently, without a clear and evidence-based assessment, understanding the impacts on fisheries and local livelihoods is impossible.

Moreover, the proposal poses considerable risks to marine species, especially through the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over large distances, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application minimises these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

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

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

In summary, the absence of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies ultimately render the assessment incomplete and unreliable. These shortcomings prevent any meaningful evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines are linked to the onshore works, yet they are evaluated separately. This fragmented approach obscures the full scale of environmental and socio-economic effects.

Onshore elements involve cabling across protected moorland, the construction of a

substation near Stornoway, and access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, is a significant concern as it is a carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, hindering the understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered together. However, the separation of onshore and offshore elements means the combined impacts on peatlands, habitats, and communities remain unclear.

Additionally, there are significant risks to sensitive habitats, such as machair systems and peatland environments that are protected by policy. The application does not show that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been taken. This indicates a gap in evidence regarding biodiversity protection.

Concerns also arise about carbon balance. Disturbing peatland releases stored carbon and could create a carbon debt, contradicting renewable energy development objectives. The application does not sufficiently address this issue or show that the overall carbon balance is beneficial.

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

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

In summary, the separation of project components, the lack of comprehensive assessment, and insufficient evidence on environmental and land use impacts make this part of the application incomplete and unreliable, hindering a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this application. It is marked by critical gaps in baseline data, the continued use of an undefined design envelope, and an overreliance on unspecified mitigation measures. Additionally, important impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for 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, as tourism impact modelling is absent. The cumulative impact of both offshore and onshore elements has not been adequately evaluated, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially considerable. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their own findings. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, engaging the precautionary principle and precluding any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, coupled with conflicts with policy and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the pertinent regulatory provisions to request 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.

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: 38A48E9B

Member of the public 1488

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with marine licensing and Environmental Impact Assessment protocols. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the proposal with statutory requirements, national policies, and the fundamental principles of sustainable development.

The application is deficient in its evidential foundation, lacking critical environmental data and presenting limited, inconsistent baseline information. Numerous aspects of the proposal are inadequately defined. The flexible design framework employed leads to ambiguities about the likely significant effects, and the reliance on unspecified mitigation measures precludes any meaningful assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the impacts on the environment, culture, or community. Assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, there are substantial conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations aimed at preserving biodiversity, addressing climate concerns, and maintaining environmental integrity. These conflicts directly affect the statutory criteria for consent and compromise the ability of the competent authority to determine the acceptability of the development within policy contexts.

The unprecedented scale of this proposal raises further issues, as large turbines are to be positioned very close to the shoreline, leading to significant concerns about landscape capacity, visual impact, and environmental repercussions. Overall, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents substantial shortcomings that compromise its reliability and transparency in addressing the environmental effects of the proposal. A significant issue lies in the use of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This uncertainty hampers a consistent application of worst-case scenarios, thereby questioning the integrity of the assessment and obscuring the true extent of environmental impacts from both the public and competent authorities.

The proposal's reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans further complicates the situation. Seeking consent based on the premise that environmental harm will be mitigated at a later stage impedes any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information until post-consent stages undermines the procedural integrity of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation prior to determination.

Moreover, the application is marred by significant evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty surrounding the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information hinders a comprehensive understanding of cumulative and worst-case impacts, leading to scientific uncertainties that conflict with statutory obligations.

Consequently, the application fails to meet the evidential threshold required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it does not convincingly show that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application has not provided a structured and reasoned comparison of realistic alternatives based on environmental effects, which is a significant shortcoming. Instead, it presents a narrative account of project evolution that fails to show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions. There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations.

Notably, the application does not illustrate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in determining impact, and the absence of such analysis raises questions about whether the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the design has not been mitigated by proper planning, relying instead on post-design mitigation measures.

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

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the overarching conclusion that the application has not been sufficiently assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally flawed, lacking a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data provided is inadequate, and the methodologies employed fail to effectively capture vital aspects such as species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Significant deficiencies are evident in the evaluation of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. The disregard for their core foraging range and behavioural patterns results in an incomplete evaluation of the potential impacts from construction activities, noise, and increased human activity. This oversight compromises any claims regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks displays considerable shortcomings, particularly due to an overreliance on aerial surveys that create significant detection

biases, especially in challenging Atlantic conditions. This methodology is likely to lead to an underestimation of basking shark presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to integrate or appropriately consider such data contributes to an inadequate baseline and diminishes the credibility of the conclusions drawn.

The methodological inadequacies in the assessment result in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation generates considerable uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the standards set by the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or evaluate protected species. The level of uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking 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 shortcomings obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impact is fundamentally flawed and presents significant inconsistencies and gaps in evidence that seriously undermine its findings. The development site is situated within crucial foraging areas and migratory corridors on the west coast of the Isle of Lewis, which hosts internationally significant seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected, failing to meet the required evidential standards.

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

The assessment falls short in demonstrating that seabirds associated with protected areas such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars

that are already facing severe declines. The methodologies utilised are likely to underestimate mortality rates, especially given the lack of comprehensive baseline data and an incomplete understanding of behavioural responses.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

One significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are mischaracterised as static features. The assessment fails to acknowledge their continued use and meaning, as well as the development's potential impact on their setting. This oversight results in an inadequate evaluation of cultural effects and disregards their importance within community life.

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks the necessary transparency for a lawful evaluation of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report remains unpublished. This creates a significant evidential gap that inhibits both public understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

Summaries of the assessment suggest that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not mere speculation. However, the absence of the full assessment hinders proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Additionally, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's own findings. Despite this, such impacts have not been adequately integrated into the main application or given the appropriate consideration. Withholding the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the full dataset, the application does not present a complete evidential basis needed to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to support positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, demonstrating compliance with this policy is unfeasible.

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

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning the seascape, landscape, and visual impacts associated with the proposal is significantly lacking and does not sufficiently reflect the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. Introducing large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to accurately depict the magnitude of the visual changes that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or represent worst-case scenarios, especially in relation to important cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated, thereby compromising

the assessment's reliability.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these as isolated assets and does not recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact, but also a broader cultural and spatial harm that has not been adequately evaluated in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant construction activities and seabed preparation within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects adequately. 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 formulated after consent, which limits the ability to assess their adequacy or effectiveness meaningfully.

This dependence on undefined future measures raises considerable concern due to the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and critical habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to present sufficient detail on how these issues 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. 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 extends to potential effects on marine species and habitats identified as sensitive within the wider assessment.

The lack of detailed emergency response procedures exacerbates these concerns. By deferring 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 risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation prior to consent, and the absence of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life provided in the application is inadequate, failing to deliver a comprehensive evaluation of ecological and socio-economic impacts. The application lacks evidence that fishing activities can be displaced without significant consequences, raising concerns about the potential for overfishing in alternative locations. This oversight is critical, as the absence of alternative fishing grounds that are accessible and capable of supporting increased pressure risks economic repercussions for the local fishing fleet.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended timeframe is likely to disturb marine life over large distances, specifically affecting species such as dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population is concerning, yet the application appears to downplay the significance of these potential impacts without adequate supporting evidence.

An inconsistency within the application arises from the acknowledgement of the need

for licences to permit harm to European Protected Species while simultaneously stating that the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not take into account the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which inhibits any determination that the proposal constitutes sustainable development.

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

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 proposal includes the introduction of permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment of the West Lewis coastline, an area noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism value.

There is a significant absence of assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Dark skies hold considerable importance for the area’s identity and for burgeoning sectors such as astro-tourism, and this omission represents a clear gap in the Environmental Impact Assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to investigate how the proposed aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are

susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, the omission contradicts National Planning Framework 4, which addresses the protection of natural places and environmental quality. This gap also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

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

TOURISM

The assessment of tourism impacts presents significant deficiencies, failing to evaluate the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery, yet it does not provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the Isle of Lewis has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nevertheless, the application neglects to model how the potential industrialisation of the seascape and deterioration of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis raises concerns about whether the proposed development would yield a net economic benefit or detract from an established and thriving sector.

Furthermore, the assessment does not adequately consider the vital role of environmental quality in attracting tourists, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a growing segment of the local economy. In a community with limited economic diversification, the failure to assess tourism impacts poses broader risks to employment, local businesses, and the sustainability of the community. The absence

of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unaddressed, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the need to illustrate a net benefit. 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 lack of quantified tourism impacts, the inadequate assessment of environmental influences on visitor behaviour, and the disregard for the island's economic dependence culminate in a significant evidential gap. This hinders 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 a significant misalignment with the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application mirrors the key issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being put forward under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape preservation, and the wellbeing of communities, the application falls short in critical areas.

A reliable and complete evidential basis for decision-making is lacking. There are notable gaps in baseline data, and the continued reliance on an undefined design envelope poses additional concerns. Furthermore, it depends on unspecified mitigation measures and fails to consider important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of likely significant effects and residual impacts.

In addition to these substantive issues, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the lack of a comprehensive Social Impact Assessment represents a material omission that hinders a proper evaluation of impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies are significant enough to deem the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The proposal fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, notably due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been sufficiently assessed, obscuring potential impacts

on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially serious. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and making it impossible to lawfully conclude that the impacts are acceptable.

Moreover, the proposal threatens to create substantial and irreversible alterations to a notably sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and the negative impact on tourism represent permanent changes that cannot be adequately mitigated.

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

In light of these considerations, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

The Hebridean Isles and communities rely on the mutual understanding and cooperation of all who live, work, belong and visit there to ensure their fragility remains their strength in maintaining the natural cultural and environmental ecosystems.

The imposed unasked for and uninvited imposition of any , and all, proposed wind farms has no right or place in such small fragile and deeply loved and historical environments.

No wind farms offshore or otherwise should be considered or ever constructed in their vicinity, or ever be visible from their shores

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: A97703A0

Member of the public 1489

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

Dear Sir/Madam

This letter formally objects to the Spiorad na Mara Offshore Wind Farm application, which was submitted under marine licensing and Environmental Impact Assessment regulations. The objection is founded on a review of the Environmental Impact Assessment Report and its accompanying documents. It identifies significant planning, environmental, cultural, and procedural deficiencies within the proposal. This development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the project, as these factors appear to conflict with statutory requirements, national policy, and sustainable development principles.

The application does not present an adequate evidential basis for lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain unspecified. The flexible design framework used in the application obstructs a clear understanding of significant effects, and without defined mitigation measures, it is impossible to assess their effectiveness. Consequently, the submitted documentation fails to provide a complete or informed understanding of the environmental, cultural, or community impacts. Claims asserting negligible or non-significant effects lack robust supporting evidence.

There are substantial policy conflicts present. The proposal seems inconsistent with the National Marine Plan, 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 prove that it can meet the national requirements for protecting biodiversity, climate interests, and environmental integrity. These discrepancies challenge the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine the proposal's acceptability according to policy.

The unprecedented scale of this proposal, which includes large turbines placed near the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. When considering the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy violations, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates significant uncertainty. This compromises the assessment's integrity and obscures the true environmental impacts, making it difficult for both the public and the competent authority to grasp the full extent of the effects.

The application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consequently, consent is sought on the premise that environmental harm will be resolved later, which impedes a meaningful evaluation of their effectiveness and the assessment of residual impacts. This postponement of crucial information to post-consent stages is not procedurally acceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly outlined before a decision is made.

Furthermore, there are considerable evidential deficiencies, including gaps in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. These issues contribute to uncertainty about the scale and significance of impacts, especially where claims of negligible effects are made without substantial supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not meet the evidential criteria set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly its stipulations on biodiversity protection and environmental integrity, since it is unclear whether the impacts have been thoroughly assessed or if appropriate safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of clear mitigation strategies, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is severely lacking and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. The application presents a narrative account of project evolution instead of a structured, reasoned comparison of realistic alternatives based on environmental effects. This failure to properly identify, assess, and select less harmful options in favour of more damaging solutions is concerning.

There is a significant lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not demonstrated that they have seriously considered the option of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such an analysis prevents any determination that the proposed siting is the least damaging option.

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

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises serious concerns regarding its impact on marine ecology and protected species in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the assessment presented is materially deficient, lacking a comprehensive and reliable understanding of the ecological receptors present. The methodologies employed do not effectively capture critical aspects of species presence, behaviour, and habitat use, resulting in an incomplete baseline.

One significant oversight is the failure to adequately recognise and assess the presence of otters, a European Protected Species, which actively forage and move through coastal regions. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased human activity remain unexamined. This gap undermines any conclusions regarding the absence of significant effects on otters.

Furthermore, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys, which are prone to detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of these sharks when compared to established land-based observations that indicate a regular use of these waters. The neglect of such relevant data leads to an inadequate baseline and compromises the reliability of the conclusions drawn.

Due to these methodological shortcomings, the assertion of negligible or non-significant effects is based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and interactions within the broader ecosystem. This uncertainty raises questions about the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The resulting uncertainty prevents the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sound 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 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 developer's Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified by the developer.

Summaries suggest that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct community engagement, not speculation. However, without access to the complete assessment, proper scrutiny of the findings is not possible, which limits the assessment of their significance in the decision-making process.

Additionally, there is evidence that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, the impacts have not been adequately included in 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. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be affected. By not providing the complete dataset, the application lacks

a solid evidential basis to weigh the benefits against potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should foster positive health outcomes and avoid harm, yet existing adverse effects indicated by available evidence have not been fully disclosed. Consequently, without the full assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a comprehensive socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This hinders a lawful determination and underlines the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

interrelation, leading to a partial understanding of the impacts on their cultural significance and setting.

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

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

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

In summary, the assessment does not accurately portray the extent of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking in necessary detail for evaluating environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans for the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment. Instead, the application relies on future mitigation and contingency measures that will be prepared after consent, which obstructs a meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns, especially considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these issues will be prevented, controlled, or monitored.

There is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to

potential effects on marine species and habitats that have already been identified as sensitive.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. Deferring contingency planning until after consent hampers the ability to evaluate whether adequate safeguards are in place to respond to pollution incidents. This creates procedural risk and diminishes the competence of the authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent; without this information, a lawful determination cannot be achieved. The application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts renders the assessment significantly deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The current application presents a troubling lack of thoroughness in its assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a bustling fishing industry, yet there is no assurance that these essential uses and habitats can be safeguarded without significant disruption.

A critical flaw lies in the presumption that fishing activity can be displaced without repercussions. The application fails to provide evidence that there are alternative fishing grounds available, accessible, or capable of absorbing additional pressures. This oversight is particularly alarming, as it poses a risk of overfishing in other areas and may result in broader economic implications for the local fishing fleet. Without a rigorous and evidence-based assessment, it is impossible to accurately comprehend the impacts on fisheries and local livelihoods.

Moreover, the proposal poses considerable threats to marine species, especially due to the underwater noise created during construction. The prolonged use of high-energy hammer piling is expected to disturb species, such as dolphins, over significant distances. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises urgent concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

There is a marked contradiction within the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, whilst simultaneously characterising impacts as negligible. This inconsistency casts doubt on

the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially in cases where harm is likely to occur at a level necessitating legal approval.

Additionally, the assessment neglects to account for cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. In the absence of a thorough evaluation of these combined effects, it is not possible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist harmoniously with existing marine users or prevent unacceptable harm to marine biodiversity, thereby undermining claims of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The 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 absence of an assessment of dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly important given the relevance of dark skies to the area’s identity and the growth of sectors such as astro-tourism. The lack of consideration for these impacts highlights a major deficiency in the overall landscape and environmental assessment.

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, leaving a crucial gap in understanding how aviation lighting might impact these species and their mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates the issue, as it does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The lack of specific night-time data is a critical oversight in understanding ecological impacts.

Without assessing nocturnal impacts, it cannot be determined whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful decision.

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also detracts from the broader evaluation of landscape and seascape impacts, as the character of night-time is an integral element of the environment.

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

TOURISM

The proposed development involves large-scale offshore infrastructure, yet the assessment of its tourism impacts is severely lacking. This gap in evaluation does not take into account the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how such infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the island has seen substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the local economy. However, the application neglects to model how the anticipated industrialisation of the seascape and deterioration of environmental quality would affect the Tourism Gross Value Added and the wider economic resilience of the area. Without this analysis, it is impossible to ascertain if the development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment does not consider the significance of environmental quality in promoting tourism. Unspoiled landscapes and dark skies are vital to visitor experiences and burgeoning markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the impacts on an acknowledged and growing component 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 enterprises, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately examined, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to establish net benefit. It also contradicts strategic goals that prioritise tourism as a growth sector and fails to furnish sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This hampers a comprehensive evaluation of the economic effects, leading to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm raises serious concerns regarding sustainable development, failing to meet the necessary statutory duties, national policy, and evidential standards. This application echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, as it presents an unacceptable level of industrialisation despite a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant shortcoming of the application is its lack of a complete and reliable evidential basis for determination. Key gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted impact pathways concerning nocturnal wildlife, full onshore infrastructure, and tourism effects compromise the integrity of the Environmental Impact Assessment. This inadequacy prevents a comprehensive understanding of the potential significant effects or residual impacts of the proposal.

Moreover, there are evident procedural failures. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose 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. These deficiencies render the application unsuitable for determination.

The proposal also contradicts the National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not adequately address health and wellbeing impacts or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected

species, and marine mammals, along with internal inconsistencies, indicate that the necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, preventing any lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is therefore requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I strongly object to these plans & proposals, due to the impact on the local areas, wildlife, people & communities, our peatlands are irreplaceable, landscapes are so precious to tourism, along with wildlife & nature, the destruction of the environment will affect-:

- N4 conflicts with the Development Plan and NPF4
- N4 harms protected seabirds
- N4 harms vulnerable and protected marine life
- N4 harms humans living in close proximity
- N4 conflicts with the landscape and character of the West Side of Lewis
- N4 harms visual amenity by introducing an industrial scale that clashes with the horizon
- N4 conflicts with and threatens tourism
- N4 harms dark skies
- N4 conflicts with transport capacity
- N4 harms heritage and other historic sites
- N4 causes cumulative harm that is long-term and difficult to reverse
- N4 conflicts with biodiversity policy
- N4 threatens community identity, tradition, and the distinct character of the West Side

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: D58568F3

Member of the public 1490

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and its accompanying documents has revealed significant deficiencies in material planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly pristine environment, and rich cultural identity. There are fundamental concerns about the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and the principles of sustainable development.

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

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

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to reliably detail the expected environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach hampers the ability to apply a worst-case scenario consistently, thereby undermining the assessment's integrity. Consequently, the impacts outlined may not accurately reflect the final development, which hinders both public and competent authority understanding of the actual environmental effects.

The application is significantly dependent on undefined mitigation measures, monitoring strategies, and management plans, which remain unestablished at this stage. As consent is being sought based on the premise that environmental harm will be addressed later, this prevents any substantive evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally inappropriate and conflicts with the fundamental aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to determination.

Additionally, there are marked evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that are incompatible with statutory requirements.

As a result, the application does not satisfy the evidential standards mandated under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that the impacts have been thoroughly assessed or that sufficient safeguards are in place.

In summary, the combination of 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 deficiencies preclude a lawful and rigorous assessment of environmental effects, placing the competent authority in a position where it cannot responsibly determine the application based on the information that has been presented.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is inadequate and does not fulfil the requirements of the Environmental Impact Assessment regime. The application fails to provide a structured comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative of project evolution, which does not adequately

demonstrate that less harmful options have been properly identified and selected over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. This inadequacy undermines the assessment's ability to furnish a solid evidential basis for evaluating potential impacts.

A critical gap exists concerning otters, classified as a European Protected Species, as the application does not sufficiently recognise or assess their use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means the potential impacts of construction-related disturbances, noise, and

increased activity have not been thoroughly evaluated. This limitation casts doubt on any conclusions suggesting there would be no significant effects on this species.

Furthermore, there are significant deficiencies in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate a frequent use of these waters. The failure to adequately incorporate or consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

Due to these methodological shortcomings, the assertions of negligible or non-significant effects rely on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions leads to an assessment that lacks reliability. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the overarching determination that the application fails to provide a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a deeply concerning situation, characterised by a flawed ornithological assessment that contains considerable evidence gaps and internal contradictions undermining its findings. It is critical to note that 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 convincingly establish that these species will not face adverse impacts. The development is situated within crucial foraging areas and migratory pathways, yet the assessment does not adequately consider the risks associated with displacement, collision, or habitat loss.

There exists a fundamental contradiction within the application's conclusions, which assert no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. This case is only applicable when significant harm is anticipated, raising serious doubts about the reliability of the assessment. Consequently, this inconsistency suggests that the conclusions drawn lack support

from the evidence presented. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Additionally, the siting of turbines within a recognised migratory corridor poses an elevated risk, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been sufficiently evaluated, nor have the potential impacts on species with relatively small global populations been considered. From a regulatory standpoint, the application fails to achieve the evidential standard required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby obstructing a lawful conclusion that would support consent.

Ultimately, the identified deficiencies reflect a non-compliance with the National Planning Framework 4 regarding the protection of biodiversity 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. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. Such deficiencies hinder a thorough evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are connected. However, the assessment of cultural heritage and community identity is inadequate. It treats heritage as isolated and static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active places of burial and spiritual practice. Yet, they are categorised as static features in the assessment, which fails to consider their continued use and the development's impact on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and disregards their importance to community life.

Additionally, the assessment neglects intangible cultural heritage like the Gaelic language and traditions, as well as the community's longstanding relationship with the coastal environment. These elements are central to the area’s identity but are entirely

absent from the evaluation, resulting in a significant oversight. Without addressing these factors, the true cultural impact of the development cannot be grasped.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been consulted through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. This omission hinders the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to recognise living cultural practices, clearly deviates from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not sufficiently support an evaluation of the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposal. The developer commissioned this assessment, which included focus groups with local residents, yet the full report remains unpublished. This represents a significant evidential gap that inhibits both public understanding and the competent authority's ability to grasp the full extent of the identified social risks based on the developer’s own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct engagement and are based on tangible experiences, not speculation. However, the failure to disclose the complete assessment hampers proper scrutiny of the findings, limiting the capacity to ascertain their significance within the decision-making process.

Furthermore, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with the developer’s own findings highlighting “cultural loss.” Despite this identification, the impacts have not been adequately integrated into the main application nor given appropriate weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be influenced. By failing to provide the full dataset, the application does not offer a complete evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development must facilitate positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications of this situation are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This gap constitutes a material omission within the application and fails to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline raises serious concerns about the assessment of seascape, landscape, and visual impacts. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of these turbines would create a dominant industrial presence, fundamentally changing the landscape and leading to a permanent transformation.

The assessment of visual change is insufficient. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots. This would directly impact visual amenity and diminish the qualities of naturalness and remoteness. Furthermore, the assessment does not adequately communicate the significance of these impacts, particularly in relation to the sensitive nature of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. There is evidence suggesting that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This risk of underestimating visual impact raises questions about the assessment's reliability.

Another significant concern is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that visually and spatially connects to the Atlantic horizon. Treating these assets as isolated overlooks their interdependence and leads to an incomplete understanding of how the proposed development would affect their context and cultural importance.

The potential industrialisation of the seascape threatens to sever these connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This represents a deeper cultural and spatial harm that the application fails to adequately address.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The extent of the proposed changes contradicts the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any claim of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would create an unavoidable dominance. Therefore, the resulting changes are fundamental and permanent, not reducible to acceptable levels through mitigation efforts.

Overall, 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 reliable evaluation, reinforcing 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 associated with the proposal is fundamentally lacking in detail, which hinders a proper evaluation of the likely environmental effects. This project entails significant seabed preparation and installation activities within the turbulent conditions of the Atlantic environment. However, it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that will only be formulated after obtaining consent, thereby obstructing any meaningful assessment of their effectiveness or adequacy.

The reliance on unspecified future measures raises considerable concerns, particularly in light of the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are at risk from sediment disturbances and potential contamination. Although the application acknowledges certain risks, including sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to adequately detail how these risks will be mitigated, controlled, or monitored.

There is also significant uncertainty surrounding the magnitude and behaviour of sediment plumes resulting from the seabed disturbances and cable installations. Without comprehensive modelling and clearly articulated management strategies, it becomes impossible to assess the extent, duration, or ecological repercussions of these impacts. This uncertainty also encompasses the potential effects on marine species and habitats already identified as sensitive within the broader assessment framework.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application limits the ability to evaluate whether sufficient safeguards are in place for responding to pollution incidents. This introduces a procedural risk, undermining the competent authority's capability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and associated mitigations prior to granting consent. The absence of this critical information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty regarding potential impacts creates a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application under consideration lacks a thorough assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. It does not sufficiently demonstrate how these important habitats and activities will be protected or maintained without significant disruption.

A critical concern is the assumption made within the application that fishing activity can be displaced without any adverse consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can handle the additional pressure that would result from such displacement. This significant omission raises concerns about the potential for overfishing in other areas, which could lead to broader economic repercussions for the local fishing fleet. Without a clear and evidence-backed assessment, understanding the impacts on fisheries and local livelihoods remains impossible.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated to occur over an extended period is expected to cause disturbances across considerable distances, affecting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application tends to minimize the importance of these effects without providing adequate evidence.

There are also inconsistencies within the application itself. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously describes the expected impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when potential harm is significant enough to necessitate legal authorisation.

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

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 avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal supports sustainable development.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment collectively render it incomplete and unreliable. These shortcomings hinder a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 presented in the application is significantly lacking, particularly in its failure to examine the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism, which heavily relies on the area's stunning coastline, almost untouched landscapes, dark skies, and sense of seclusion, has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite the application noting that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution from tourism.

Moreover, the application neglects to model the potential impacts of the industrialisation of the seascape and deterioration of environmental quality on Tourism

Gross Value Added and the broader economic resilience of the area. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect this established and expanding sector.

The role of environmental quality in enhancing tourism is another critical oversight, as unspoiled landscapes and dark skies significantly contribute to the visitor experience, particularly in emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment amplifies this shortcoming, creating a considerable gap in understanding the effects on a vital and growing component of the local economy.

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

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependence result in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet sustainable development requirements when evaluated against statutory duties and national policy. It echoes the significant issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it remains insufficient.

There are significant gaps in the evidential basis for this application. It relies on an undefined design envelope and mitigation measures that have not been clearly specified. Key impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Furthermore, there are procedural shortcomings that must be addressed. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties set out in the Islands (Scotland) Act 2018. In addition, the failure to disclose the complete

Social Impact Assessment represents a critical omission. These gaps 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 also conflicts directly with National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural areas, or cultural heritage. Moreover, it 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 assessment of cumulative impacts, both offshore and onshore, has not been adequately conducted, leaving unresolved effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties around environmental risks remain significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent at times. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and undermining the legitimacy of concluding that the impacts are acceptable.

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

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

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

Additional Comments

As a very proud Niseach, who now lives in Liverpool, I am so sad to read about this proposal. The natural beauty of the Isle of Lewis never ceases to amaze me every time I come home on holiday. Still to this day, I look around me when I am home and think how lucky we are to have grown up in such a stunningly beautiful place and my children feel the same. To think that the landscape could change so significantly is unthinkable. The sheer size of these proposed turbines does not bear thinking about. The island will never be the same again. Having read all the information, there is also the impact these turbines will have on our communities' health and wellbeing to consider, as well as all the impacts on tourism, wildlife and marine life etc. The list is endless. And to what ends? To make money that won't even benefit our island in any way?

Please do not let this development go ahead. It would be utterly heart-breaking to see our beautiful island coasts ruined forever by this massive infrastructure project. The visual appearance, natural beauty and ecological integrity of our island is unrivalled. Please do the right thing for our communities and future generations.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 39E8CE76

Member of the public 1491

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment processes. Concerns arise from a review of the Environmental Impact Assessment Report and accompanying documents that reveal significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural elements. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks comprehensiveness and does not deliver a dependable understanding of the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically vibrant marine system, yet the baseline data remains inadequate, and the

employed methodologies do not effectively capture species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to provide a solid evidential basis for determining potential impacts.

One significant shortcoming is the treatment of otters, a European Protected Species. The application inadequately recognises and evaluates their active utilisation of coastal zones for both foraging and movement. The omission of their core foraging range and behavioural patterns leads to insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This deficiency undermines any conclusions made regarding the absence of significant effects on this species.

In addition, the evaluation of basking sharks also reveals notable deficiencies, particularly due to the reliance on aerial surveys which introduce considerable detection bias, especially under Atlantic weather conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used. The lack of integration or proper consideration of such data culminates in an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological flaws imply that any conclusions asserting negligible or non-significant effects are grounded in assumptions rather than robust evidence. The insufficient baseline data further hinders a meaningful appraisal of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This engenders uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the 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 introduced obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is impossible to lawfully grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, characterised by significant evidence gaps and internal contradictions that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already facing decline, yet the proposal does not adequately demonstrate, to the necessary evidential standard, that these species will

not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, but the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A critical inconsistency is evident in the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only relevant where significant harm is anticipated. This contradiction raises serious questions about the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence.

The assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not properly considered, and the reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially where baseline data is insufficient and behavioural responses are inadequately understood.

Placing turbines within a recognised migratory corridor introduces considerable risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality 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 conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, inhibiting any lawful conclusion in favour of consent.

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

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and lack of adequate evidence. These issues impede a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application has significant shortcomings regarding the assessment of community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement

undermines the assessment's legitimacy and disregards established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These sites are active places for burial and spiritual practice, yet they are inaccurately categorised as static features. This mischaracterisation fails to acknowledge their ongoing use and meaning, as well as the potential impact of development on their setting. Consequently, this results in an inadequate evaluation of cultural effects and neglects their importance in community life.

The assessment of cultural heritage and community identity is fundamentally lacking and fails to recognise the West Lewis coastline as a living cultural landscape. It overlooks the intrinsic connections between environment, language, tradition, and community. By adopting a reductive approach, the application treats heritage as a series of isolated, static assets, ignoring their social, cultural, and spiritual functions within the community.

Additionally, the application neglects to assess intangible cultural heritage, such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are absent from the assessment, representing a significant omission. Without considering these factors, the true cultural impact of the development remains unexamined.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated 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. This absence alone is sufficient to impede a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding the assessment of social impacts, health, and wellbeing, which is significantly inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that involved focus groups with local

residents, the full report remains unpublished. This creates a substantial evidential gap that hinders both the public and the competent authority from comprehending the extent of social risks revealed by the developer's own research.

Available summaries suggest that residents are already suffering from measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These effects arise from direct engagement and are not speculative in nature. However, without disclosing the complete assessment, there is an inability to scrutinise the findings adequately, which limits the capacity to gauge their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with the term “cultural loss” noted within the developer’s own findings. Despite this recognition, these impacts have not been fully integrated into the main application nor given the appropriate weight they deserve. The omission of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency severely undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be at stake. The absence of the complete dataset means that the application does not provide a solid evidential foundation for assessing the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid harm, yet the evidence currently available points to existing adverse effects that remain undisclosed. Without access to the full 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 the complete Social Impact Assessment. This omission represents a material shortcoming within the application and fails to satisfy the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leaves the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is severely lacking and does not truly capture the extent of change nor the sensitivity of the environment in question. The West Lewis coastline is characterised by its expansive Atlantic horizon,

its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Furthermore, the application fails to accurately depict the magnitude of the visual change. Due to their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts in relation to such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises the possibility that the true extent of the visual impact has been minimised, thus compromising the reliability of the assessment.

Moreover, there is a critical failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging 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 perceived and severing their connection to the natural horizon. This goes beyond a mere visual impact; it represents a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, this proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The degree of change proposed is incompatible with the need to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

Additionally, it is apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage.

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

CONSTRUCTION AND POLLUTION RISKS

The application presents an incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate potential environmental effects. It proposes significant seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be prepared after consent, inhibiting any meaningful evaluation of their adequacy or effectiveness.

The sensitivity of the receiving environment raises additional concerns. 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 chemical or oil spills, it does not provide enough information on how these risks will be prevented, controlled, or monitored.

There is also uncertainty concerning the scale and behaviour 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 extent, duration, or ecological effects of these impacts. This uncertainty includes potential effects on marine species and habitats identified as sensitive in the broader assessment.

Further compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application hampers the evaluation of whether adequate safeguards exist to manage pollution events. This creates procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the Environmental Impact Assessment requirements. Significant effects and mitigation measures must be assessed before consent, and if this information is lacking, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of the potential impacts on marine life and fisheries is inadequate and lacks a thorough assessment of both ecological and socio-economic effects. The fishing industry is active in the waters off the West Lewis coast, which also hosts a diverse marine ecosystem. However, the application does not sufficiently demonstrate that these activities and habitats can be safeguarded from significant disruption.

A major concern is the assumption that fishing activities can be moved without repercussions. The application does not provide evidence that alternative fishing locations are available, accessible, or able to handle increased pressure. This is a critical gap, as displacing fishing efforts risks overfishing in other areas and could lead to broader economic challenges for the local fishing fleet. Without a clear, evidence-based evaluation, the consequences for fisheries and local livelihoods remain unclear.

The proposal poses notable risks to marine species, particularly due to the underwater noise produced during construction. The extended use of high-energy hammer piling is expected to create disturbances over considerable distances, potentially affecting marine mammals such as dolphins. There are serious worries regarding the predicted disruption to a significant segment of the local bottlenose dolphin population, yet the application diminishes the importance of these effects without sufficient evidence.

The application also exhibits a clear contradiction by recognising the necessity for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

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

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can operate alongside existing marine users or prevent unacceptable harm to marine biodiversity, which obstructs any conclusion regarding the proposal's sustainability.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions lead to an incomplete and unreliable assessment. These issues hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal consists of offshore turbines and various onshore works, which are integral to the project. However, the assessment of the onshore infrastructure is materially incomplete, as it fails to account for the full extent of impacts associated

with this single integrated project. The separation of the offshore and onshore elements leads to a fragmented evaluation, obscuring the true scale of the environmental and socio-economic effects involved.

Onshore works entail cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The application does not offer a comprehensive assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to provide a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered collectively. However, the distinction between offshore and onshore elements means the cumulative impacts on peatlands, habitats, and communities are not fully understood.

There are also significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This situation represents a clear evidential gap concerning biodiversity protection.

The proposal raises additional concerns regarding carbon balance. The disturbance of peatland releases stored carbon, which may result in a carbon debt, contradicting the objectives of renewable energy development. The application fails to adequately address this matter or show that the overall carbon balance remains beneficial.

Furthermore, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the 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 demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further undermines the application.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable scale of industrialisation was a decisive factor. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential foundation necessary for informed determination.

There are significant deficiencies in the baseline data provided, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the failure to address key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, render the Environmental Impact Assessment inadequate. This lack of completeness prevents a thorough understanding of likely significant effects or any residual impacts.

The procedural failures are evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are sufficient to deem the application unfit for determination.

In direct violation of National Planning Framework 4, the proposal fails to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that

the competent authority either refuses consent based on these grounds or invokes the necessary regulatory provisions to compel the submission of the missing information.

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

Additional Comments

This project is set to have an absolutely devastating impact - visually, culturally and ecologically on a huge area of the Isle of Lewis and for many people living in this area.

I work in nature conservation on the island and am also very concerned that the impacts on seabird populations and marine life have not been fully considered and assessed properly.

While we certainly need to be producing more energy sustainably in the UK, there is no way that this project or any other similar projects should be considered given the enormous negative and permanent impacts that this will have on the island.

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: 772B7E43

Member of the public 1492

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoilt environment, and rich cultural heritage. The proposal raises serious concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a robust evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and various critical aspects of the proposal remain undefined. The reliance on a flexible design framework obscures an understanding of potential significant effects, while the dependence on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed assessment of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack solid evidence.

There are evident and significant conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and community health and wellbeing. It does not prove that it meets national standards for protecting biodiversity, climate interests, and environmental integrity. These policy inconsistencies directly impact the statutory tests required for consent and jeopardise the ability of the relevant authority to deem the development acceptable according to policy guidelines.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. The lack of adequate information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident non-compliance with policy collectively indicate that the application is deficient and does not support a lawful determination. In light of these factors, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. This inadequacy undermines the assessment's ability to furnish a solid evidential basis for evaluating potential impacts.

A critical gap exists concerning otters, classified as a European Protected Species, as the application does not sufficiently recognise or assess their use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means the potential impacts of construction-related disturbances, noise, and increased activity have not been thoroughly evaluated. This limitation casts doubt on any conclusions suggesting there would be no significant effects on this species.

Furthermore, there are significant deficiencies in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate a frequent use of these waters. The failure to adequately incorporate or consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

Due to these methodological shortcomings, the assertions of negligible or non-significant effects rely on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions leads to an assessment that lacks reliability. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the overarching determination that the application fails to provide a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of the application reveals significant shortcomings in addressing cultural heritage and community identity, particularly in relation to the West Lewis

coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are intricately linked. The assessment adopts a narrow view, treating heritage merely as isolated and static features, rather than recognising their ongoing social, cultural, and spiritual importance to the community.

A major flaw in the assessment is the handling of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet they are mischaracterised as static elements, overlooking their continued relevance and the potential impacts of development on their surroundings. This inadequate portrayal leads to a superficial evaluation of cultural effects and neglects their vital role in community life.

Moreover, the assessment fails to acknowledge intangible cultural heritage aspects, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These factors are crucial to the area's identity but are entirely omitted from the evaluation, leading to a critical gap in understanding the cultural impact of the development.

Concerns about community rights and engagement also arise, particularly given that the Gaelic-speaking population has a distinct cultural identity akin to that of Indigenous Peoples. The absence of a Free, Prior and Informed Consent process undermines the validity of the assessment and fails to adhere to recognised principles for participation in decisions that affect cultural and environmental interests.

A significant procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic implications for the island community. This omission prevents any lawful determination regarding the development.

From a policy standpoint, these inadequacies directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear violation of established policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, resulting in an insufficient basis for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This omission creates a significant evidential gap, hindering both public understanding and the competent authority’s evaluation of social risks identified in the developer’s own

research. Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, resulting from direct engagement, are not speculative, yet the lack of transparency regarding the full assessment restricts proper scrutiny of these findings and limits their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” identified in the developer’s findings. Despite this, the impacts have not been adequately integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

The absence of transparency severely undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning could be affected. By failing to provide the full dataset, the application does not present a complete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must facilitate positive health outcomes and avoid causing harm; however, the evidence suggests existing adverse effects have not been fully disclosed. In light of the incomplete assessment, compliance with this policy remains unproven.

The procedural ramifications are considerable. Without access to the complete Social Impact Assessment, the competent authority cannot conduct a robust socio-economic and health evaluation. This represents a material omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This lack of information prevents a lawful determination and confirms that the application is not supported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Another notable deficiency is the lack of evaluation of the interconnectedness between seascape, landscape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets as isolated entities instead of acknowledging their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

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

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Consequently, the resulting change is inherent and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

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

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.

SUMMARY

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

There are significant deficiencies in the evidential basis provided for the determination of this application. It lacks comprehensive baseline data and relies on an undefined design envelope, alongside unspecified mitigation measures. Moreover, it overlooks critical impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and potential tourism impacts. As a result, the Environmental Impact Assessment remains incomplete, failing to offer a thorough understanding of likely significant effects or residual impacts.

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

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

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

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with conflicts with

policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority must therefore either refuse consent based on these grounds or utilise the relevant regulatory provisions to necessitate the submission of the missing information.

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

Additional Comments

Please dont destroy our beautiful Island !

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: D36A7895

Member of the public 1493

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. It stems from a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural elements. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched natural environment, and rich cultural identity. The dimensions, proximity, and design of this project raise serious questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and critical components of the proposal remain unspecified. The employment of a flexible design framework obscures an understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by solid evidence.

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

The proposal's scale is unprecedented for this location, with large turbines sited near the shoreline, provoking substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, 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 should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application for this proposal raises urgent concerns regarding the Environmental Impact Assessment Report, which is notably deficient. It fails to provide a thorough, transparent, and reliable account of the potential environmental impacts. One significant issue is the use of a flexible Project Design Envelope. This approach, lacking commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. Consequently, the assessment lacks integrity, meaning the impacts presented may not accurately reflect the development as it will ultimately be constructed. This situation prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application places heavy reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions means that any environmental harm is expected to be addressed later, hindering any meaningful evaluation of their effectiveness or the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to any determination.

There are significant evidential deficiencies present, including notable gaps in baseline data, limitations in the methodology employed, and a reliance on assumptions instead of site-specific evidence. As a result, there is uncertainty surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

This inadequacy leads to a failure in meeting the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. It invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These serious deficiencies obstruct a lawful and thorough assessment of environmental effects and leave the competent authority ill-equipped to determine the application based on the information submitted.

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 evaluation of marine ecology and protected species has significant deficiencies that compromise its reliability and completeness. The West Lewis coastal environment is biologically active and sensitive, yet the baseline data collected is insufficient. The methodologies used do not adequately capture the presence, behaviour, and habitat usage of various species, leading to a lack of sound evidence for assessing potential impacts.

One major oversight is the treatment of otters, which are recognised as a European Protected Species. The application does not properly acknowledge their active use of coastal areas for foraging and movement. Ignoring their core foraging range and behavioural habits means that the assessment fails to evaluate the impacts of

construction disturbance, noise, and increased human activity on these animals. This gap undermines any conclusions drawn about the absence of significant effects on otters.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented is fundamentally unreliable, characterised by 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. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the proposed development, yet the assessment inadequately evaluates the risks of displacement, collision, or habitat loss.

Notably, there is a critical contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case, which is only needed when 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 evidence

available.

Furthermore, the assessment does not adequately show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully recognised, and reliance on modelling approaches introduces considerable uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates an additional and severe risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality in this corridor, nor does it consider the potential impacts on species with relatively small global populations.

Regulatory compliance is also in question; the application does not fulfil the evidential threshold required to conclude there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, means that the necessary standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Moreover, these identified deficiencies represent a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment is characterised by unreliability due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a thorough evaluation of potential impacts and culminate in the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, particularly in its treatment of the West Lewis coastline, which should be regarded as a living cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a reductive approach, treating heritage merely as isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment fails to properly address culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These active burial and spiritual practice locations are mischaracterised as static features, overlooking their continued

use and meaning, as well as the potential impacts of development on their settings. This misrepresentation leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment lacks consideration of intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are integral to the area's identity but are completely omitted from the assessment, representing a significant deficiency. The failure to account for these factors prevents a proper understanding of the cultural impacts of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique 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 validity of the assessment and contravenes established principles of participation in matters affecting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The failure to conduct this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. 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, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to recognise living cultural practices, illustrates a clear departure from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sufficient basis 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 of visual, landscape, and seascape impacts is significantly lacking and does not adequately capture the degree of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to represent the extent of the visual change. Given their scale and closeness, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the level of this impact or its significance within the context of such a sensitive landscape.

There are also concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact may have been understated, undermining the assessment's reliability.

Additionally, the assessment does not consider the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, rather than acknowledging their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural importance.

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

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 inconsistent 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 any claim of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment provided regarding construction and pollution risks is notably deficient, lacking the essential detail needed to properly evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will only be developed after consent, which hampers any meaningful assessment of their adequacy or effectiveness.

The reliance on these vague future measures raises serious concerns, particularly due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it falls short in providing adequate details on how these risks will be prevented, managed, or monitored.

Furthermore, there is considerable uncertainty surrounding the magnitude and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and well-defined management strategies in place, 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 identified as sensitive in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether effective safeguards are available to address pollution incidents. This procedural risk weakens the competent authority's capability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the postponement of key environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is issued, and when such information is absent, a lawful determination cannot occur. Additionally, the application does not adequately demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment seriously flawed. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. The assessment of fisheries and marine life provided

by the application is insufficient and does not adequately evaluate the ecological or socio-economic impacts. A crucial issue is the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available and accessible, which raises concerns about the risk of overfishing and the potential economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment hinders a proper understanding of the impacts on fisheries and livelihoods.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling planned for an extended period is expected to cause disturbances over large distances, potentially affecting marine species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay these effects without sufficient evidence to support such minimisation.

Moreover, the application acknowledges the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where anticipated harm is significant enough to require legal authorisation.

Cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity, are not adequately addressed in the assessment. 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 National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users and avoid unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions make the assessment incomplete and unreliable. These shortcomings prevent a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal consists of offshore turbines and various onshore works, which are integral to the project. However, the assessment of the onshore infrastructure is materially incomplete, as it fails to account for the full extent of impacts associated with this single integrated project. The separation of the offshore and onshore elements leads to a fragmented evaluation, obscuring the true scale of the environmental and socio-economic effects involved.

Onshore works entail cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The application does not offer a comprehensive assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to provide a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered collectively. However, the distinction between offshore and onshore elements means the cumulative impacts on peatlands, habitats, and communities are not fully understood.

There are also significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This situation represents a clear evidential gap concerning biodiversity protection.

The proposal raises additional concerns regarding carbon balance. The disturbance of peatland releases stored carbon, which may result in a carbon debt, contradicting the objectives of renewable energy development. The application fails to adequately address this matter or show that the overall carbon balance remains beneficial.

Furthermore, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the 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 demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment notably lacks any examination of dark skies and nocturnal wildlife, which is a serious omission. The West Lewis coastline is renowned for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that will be visible over considerable distances, creating an intrusive

"wall of light" effect along the western horizon and fundamentally changing the night-time landscape.

Furthermore, the application fails to evaluate how this lighting will impact visual amenity, landscape character, or the experience of both residents and visitors. This is particularly significant considering the crucial role dark skies play in the local identity and the growth of tourism sectors such as astro-tourism. The neglect of these issues indicates a clear deficit in the overall landscape and environmental evaluation.

More concerning is the lack of analysis 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, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a study on phototaxis means there is no consideration of how aviation lighting could impact these species or heighten mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated dangers. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data results in a significant gap in understanding the ecological implications.

Without a proper assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might be adversely affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural environments and the preservation of environmental quality. Additionally, they weaken the overall assessment of landscape and seascape impacts since the character of night-time environments is a vital aspect of the ecological landscape.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a considerable evidential shortfall. The lack of baseline data, impact modelling, and species-specific analysis renders the application insufficient and unable to support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. It echoes the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application is presented under a more robust

policy framework that prioritises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant shortcomings in the evidential basis provided for determination. Critical gaps exist in baseline data, and the use of an undefined design envelope raises further concerns. The application relies on unspecified mitigation measures and omits crucial impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to adequately convey the likely significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment is a notable omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, nor does it sufficiently address health and wellbeing impacts or prove a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been assessed thoroughly, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. 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 that impacts can be deemed acceptable.

Moreover, the proposal is set to cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism are all permanent effects that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful, evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or enforces the relevant regulatory measures to obtain the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is rejected in its entirety.

Additional Comments

After living most of my life in the Hebrides in beautiful and hard working communities I left due to ferry crisis and services in the Uists being badly depleted. I regret leaving. But widowhood does not come easy. I lasted two and a half years. And returned to what I thought would suit me best. outside Stornoway. Sadly, since I've returned two massive housing developments have started on my usual route to town. for workers. Eventually locals, not for years, when they are needed NOW. I feel so sorry for the residents in Parkend and Branahue. I lived in a working development for those mainland years. It was brutal. The windfarm, is beyond believe. I have ticked the boxes above. So will not write more as they outline all my concerns. I have no objection to wind power. Indeed I am a shareholder in Uist Wind on North Uist. They are a blot on the landscape. But as an artist I sometimes use them in my work. They are no different from communications masts and all of that. Stuff we need in this fast moving world. There is plenty landscape. BUT the size of this windfarm development beggars believe. I am very sad about it and I shudder to think what the impact is on those west side communities. I am also very concerned about the effect of the vast influx of workers will have in the town of Stornoway. I fear it will not be a pleasant place to live anymore.

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: 4ED4C67C

Member of the public 1494

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the relevant marine licensing and Environmental Impact Assessment frameworks. It highlights significant deficiencies across planning, environmental, cultural, and procedural dimensions. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal emerge due to its potential incompatibility with statutory requirements, national policy, and sustainable development principles.

A critical issue lies in the application's inadequate evidential basis for a lawful determination. There is a notable absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The proposal's flexible design framework hinders a clear assessment of likely significant effects. Reliance on unspecified mitigation measures precludes an evaluation of their potential effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Moreover, there are evident and substantial conflicts with established policies. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate adherence to national obligations aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's policy acceptability.

The unprecedented scale of the proposal raises further alarm, with large turbines positioned uncomfortably close to the shoreline, which introduces serious concerns related to landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, dependence on undefined mitigation, evidential shortcomings, and clear policy discrepancies illustrate that the application is incomplete and incapable of facilitating a lawful determination. In light of these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and lacks a full and reliable account of the potential environmental effects of the proposal. There is significant uncertainty due to the use of a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This lack of specificity undermines the assessment's integrity, making it impossible to consistently apply a worst-case scenario. Consequently, the impacts described may not accurately reflect the final development, which hinders both public understanding and the competent authority's ability to grasp the actual environmental effects.

The application places considerable reliance on mitigation measures, management plans, and monitoring strategies that remain undefined. As a result, consent is sought with the expectation that environmental harm will be managed at a later date. This approach prevents a meaningful evaluation of how effective these measures will be and hampers the assessment of any residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also notable deficiencies in evidence, including gaps in baseline data and limitations in methodology, which lead to reliance on assumptions rather than site-specific evidence. This creates uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are claimed without robust supporting data. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential standards outlined in the Habitats Regulations, which necessitate excluding adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it does not adequately demonstrate that impacts have been fully assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a robust assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured comparison of viable alternatives based on environmental effects, it presents a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and

selected over more damaging solutions.

There is also a noticeable absence of a transparent or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Particularly, the application does not show that the developer has genuinely considered positioning the turbines further offshore, where the visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in determining impact, the lack of such analysis undermines any assertion that the proposed siting is the least damaging option.

The deficiencies are evident in the assessments of cable routing and landfall, where the evidence fails to show that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors. This includes locations of cultural and spiritual significance such as Barvas Cemetery. The omission of a clear avoidance strategy and the absence of comparative analysis indicate that there has been no application of mitigation by design, with reliance instead on post-design measures.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This signifies a disregard for the established mitigation hierarchy, hindering the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment represents a material omission that ultimately supports the conclusion that the application has not been thoroughly assessed and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally lacking and fails to offer a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is not only highly sensitive but also biologically active. However, the baseline data provided is incomplete, and the methodologies used do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant shortfall pertains to otters, a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leaves unassessed the potential effects arising from construction disturbance, noise, and increased activity. This oversight weakens any conclusions

drawn regarding the absence of significant effects on this species.

There are also notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are used frequently. The neglect to incorporate or adequately consider such data results in an incomplete baseline, thereby undermining the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are grounded in assumptions rather than on robust evidence. The lack of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a robust evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally significant seabird populations that are already in decline. However, the ornithological assessment accompanying the application is fundamentally flawed. It contains significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The assessment fails to sufficiently demonstrate that these vulnerable species will not be adversely affected, particularly in light of the potential for displacement, collision risk, and habitat loss.

Compounding these issues is a fundamental contradiction within the application itself, where the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions are not adequately supported by the available evidence.

Moreover, the assessment does not provide enough evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not thoroughly addressed, and the reliance on modelling techniques introduces further uncertainty, especially concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given the inadequacy of baseline data and the incomplete understanding of behavioural responses.

Additionally, the siting of turbines within a recognised migratory corridor introduces a considerable risk by creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately evaluate the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

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

The deficiencies noted 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.

Overall, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings impede a thorough evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Significant shortcomings arise in the evaluation of culturally important sites, including the cemeteries located at Dalmore, Bragar, and Barvas. These areas serve as active burial grounds and sites for spiritual practices, yet they are inaccurately classified as static features. This oversight neglects their current use, meaning, and the implications

of development on their surroundings. Such a mischaracterisation leads to a deficient understanding of cultural impacts and disregards the vital role these sites play in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly deficient, lacking the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This absence creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

Summaries available indicate that residents are currently experiencing notable stress,

anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are thus not speculative in nature. Nonetheless, the failure to disclose the complete assessment prevents thorough scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Evidence suggests that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” being highlighted in the developer's own findings. Despite this acknowledgement, the impacts have not been adequately incorporated into the main application nor assigned appropriate weight in the decision-making process. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community may be at stake. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unsubstantiated.

The procedural implications of these deficiencies 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 represents a material omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by an open Atlantic horizon and a strong sense of remoteness. This area is noted for its undeveloped character, and the presence of such turbines would create a continuous industrial presence that would fundamentally alter the landscape, resulting in a permanent and irreversible transformation. The application fails to adequately represent the magnitude of the visual change that would occur. Due to their scale and proximity to the shoreline, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, significantly

impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. It appears that these viewpoints do not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This methodological flaw raises the risk that the magnitude of the visual impact has been understated, which undermines the reliability of the overall assessment.

Additionally, there is a significant deficiency in the assessment's consideration of the interconnected relationship between landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This change represents not just a visual impact but a broader cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, which protects natural places and historic assets. The scale of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any assertion of compliance with policy.

Finally, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making the resulting change fundamental and permanent rather than reducible to an acceptable level through mitigation efforts. In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings 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 entails significant seabed preparation and installation activities within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail necessary to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are intended to be established after consent is granted, which impedes any meaningful evaluation of their adequacy or effectiveness.

This dependence on undefined future measures raises serious concerns, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in providing adequate details on prevention, control, or monitoring strategies.

Additionally, there is uncertainty regarding the extent and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the ability to evaluate whether proper safeguards are in place to manage pollution events, introducing procedural risks that undermine the competent authority's capacity to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed before consent is granted, and the absence of such information renders a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In conclusion, the combined absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts lead to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application under consideration presents a significant concern regarding the assessment of fisheries and marine life, which is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine ecosystem and support an active fishing industry; however, the proposal does not provide evidence that these essential uses and habitats can be preserved or maintained without notable disruption.

A critical shortcoming lies in the presumption that fishing activities can be displaced without repercussions. The application fails to substantiate claims that there are alternative fishing grounds available, accessible, and able to accommodate any additional pressure. This lack of evidence is crucial, as displacement of fishing efforts

could lead to overfishing in other areas and create broader economic ramifications for the local fishing fleet. Consequently, without a well-supported assessment, the potential impacts on fisheries and the livelihoods dependent upon them remain inadequately understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over extended durations is expected to disturb marine life over extensive distances, including species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application diminishes the importance of these potential effects without providing sufficient evidence.

Inconsistencies within the application further exacerbate concerns. While there is an acknowledgment of the necessity for licenses to permit harm to European Protected Species, the impacts are concurrently described as negligible. This contradiction not only undermines the credibility of the assessment but also raises doubts about compliance with the Habitats Regulations, especially in instances where anticipated harm would require legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. An absence of a comprehensive evaluation regarding these cumulative effects hinders the ability to ascertain the overall implications for 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 falls short of showing that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

In summary, the deficiencies noted—including a lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies—render the assessment incomplete and unreliable. These shortcomings prevent a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure lacks completeness and fails to address the full range of impacts associated with this single integrated project. There is an intrinsic link between the offshore turbines and the onshore works, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects.

Onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access

infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application falls short in providing a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application inhibits a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project are considered collectively. However, the distinct treatment of offshore and onshore elements leads to an incomplete understanding of their combined impacts on peatlands, habitats, and communities.

Moreover, there are notable risks to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This leaves a significant evidential gap regarding biodiversity protection.

The proposal also raises serious concerns about carbon balance. Disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy initiatives. The application inadequately addresses this aspect or proves that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to assess the project as a cohesive unit and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon and fundamentally altering 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. This oversight is particularly concerning given the growing significance of dark skies to the local identity and emerging tourism sectors, such as astro-tourism.

Moreover, there is a critical absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that there is no understanding of how the proposed aviation lighting could affect these species or increase mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. For example, 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 absence of site-specific night-time data creates a critical gap in comprehending ecological impacts.

Without assessing the nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to demonstrate no adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omission conflicts with the National Planning Framework 4, which pertains to the protection of natural places and the preservation of environmental quality. This oversight further undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral part of the environment.

In conclusion, the absence of any assessment related to dark skies and nocturnal wildlife represents 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 presented in the application significantly lacks thoroughness, particularly regarding its evaluation of tourism impacts, which are critical for the Isle of Lewis. Tourism relies heavily on the island's wild coastline, near-pristine landscapes, dark skies, and its overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the proposed large-scale offshore infrastructure may alter visitor numbers, behaviour, or their overall economic contribution.

Tourism on the Isle of Lewis has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while

accounting for up to 16% of the local economy. Nonetheless, the application neglects to model the potential impacts that the industrialisation of the seascape and deterioration of environmental quality could have on Tourism Gross Value Added and the broader economic resilience of the area. Without such critical analysis, it remains unclear whether the proposed development could yield a net economic benefit or jeopardise this vital sector.

The current assessment fails to recognise how environmental quality is intertwined with tourism, especially the significance of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further exacerbates the issue, leading to a considerable lack of understanding regarding impacts on this recognised and expanding facet of the local economy.

Given the context of a community on an island that has limited economic diversification, the shortcomings in assessing tourism impacts carry broader implications for local employment, businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning the assessment of economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In conclusion, the failure to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the economic dependency of the island results in a significant evidential void. This deficiency obstructs a comprehensive evaluation of the economic effects and supports the assertion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the criteria of sustainable development when evaluated against statutory duties, national policy, and evidential requirements. It mirrors the critical issues associated with the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Fundamental to the assessment process is the lack of a comprehensive and reliable evidential foundation. The application reveals notable deficiencies in baseline data and continues to rely on an undefined design envelope. Moreover, it depends on mitigation measures that remain unspecified and fails to account for significant impact pathways,

such as those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, obstructing a thorough understanding of probable significant effects or residual impacts.

There are also evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment represents a violation of statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These deficiencies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It fails to demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, does not substantiate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, thereby obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

The environmental risks remain uncertain and could potentially be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

Moreover, 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 negative impacts on tourism represent enduring effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority is urged either to deny consent on these grounds or to invoke 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.

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: 58C8F946

Member of the public 1495

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 celebrated for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence, raising significant concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential basis necessary for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework inhibits a clear understanding of potential significant effects. This, coupled with the reliance on unspecified mitigation measures, renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with established policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine that the development meets policy acceptability.

The scale of this proposal is unprecedented in the area, with large turbines situated in close proximity to the shoreline, which introduces serious concerns regarding landscape capacity, visual impact, and environmental consequences. In light of the insufficient information, reliance on undefined mitigation, evidential weaknesses, and apparent policy non-compliance, it is clear 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 is fundamentally lacking, failing to deliver a comprehensive, clear, or dependable overview of the anticipated environmental repercussions of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates a considerable degree of uncertainty. This uncertainty undermines the reliability of the assessment, meaning that the potential impacts may not accurately reflect the development that will ultimately be built. Consequently, both the public and the competent authority are left without a proper understanding of the true scope of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives in accordance with the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough assessment based on environmental effects, it offers a narrative of project evolution. This method does not adequately

demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has seriously explored the possibility of siting turbines further offshore, where the impacts on visual aesthetics, ecology, and the coastal environment would likely be diminished. Considering the sensitivity of the West Lewis coastline and the critical importance of proximity to shore for assessing impacts, the lack of such analysis precludes any assertion that the proposed siting is the least damaging option available.

The shortcomings are evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately considered to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and the failure to conduct comparative analysis indicate a neglect of mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more appropriate alternatives may exist. The deficiency in providing a robust alternatives assessment prevents a conclusion that the proposal is sustainable or compliant with policy.

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 lack of a structured and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

construction disturbance, noise, and increased activity remain insufficiently assessed. As a result, any conclusions drawn regarding the absence of significant effects on this species are compromised.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant deficiencies, characterised by substantial gaps in evidence and contradictions that undermine its validity. The application does not demonstrate, to the requisite evidential standard, that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline, will not suffer adverse effects. The proposed development is situated within crucial foraging areas and migratory routes, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental inconsistency within the application itself. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious concerns about the reliability of the

assessment and suggests that its conclusions lack proper substantiation from the underlying evidence. Additionally, the assessment does not sufficiently establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully take into account the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor further compounds these risks, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and the potential impact on species with relatively small global populations have not been adequately assessed.

From a regulatory standpoint, the application does not satisfy 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, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and precludes a lawful conclusion supporting consent.

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

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of impacts and culminate in the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application is fundamentally flawed in its assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The evaluation adopts a simplistic view, treating heritage merely as a collection of 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 for burial and spiritual practices, yet the assessment mistakenly categorises them as static features, disregarding their continued use and meaning as well as the impact of

development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and overlooks their integral role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship the community maintains with the coastal environment. These factors are vital to the area's identity and are not addressed in the assessment, representing a significant oversight. The cultural impact of the development, therefore, cannot be comprehensively evaluated without consideration of these elements.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population is recognised as having a distinct cultural identity characteristic of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement diminishes the legitimacy of the assessment and contravenes established principles of participation regarding decisions that affect cultural and environmental interests.

A major 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 cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination of the application.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding 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.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been published, leading to a significant evidential gap that obstructs both public understanding and the competent authority's evaluation of the social risks identified by the developer's own research. Available summaries reveal that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative. Nonetheless, the lack of full disclosure limits proper scrutiny of the findings and hinders the assessment of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” highlighted within the developer’s findings. Despite this, these impacts have not been adequately integrated into the main application or given the necessary weight. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning are at stake. By withholding the full dataset, the application does not provide a complete evidential basis to weigh the balance between benefits and harm.

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

The procedural implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The assessment does not sufficiently represent the magnitude of the anticipated visual changes. Due to the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would severely impact visual amenity and diminish the defining characteristics of naturalness and remoteness. Moreover, the assessment fails to adequately convey the level of impact or its significance within such a sensitive landscape.

Concerns also arise regarding the methodology employed in the selection and

presentation of visual viewpoints. There is evidence to suggest that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

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

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

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

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

In summary, the assessment fails to accurately represent the scale of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the environmental assessment related to construction and pollution risks. It lacks the necessary detail to effectively evaluate potential environmental impacts, particularly given that the West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. This sensitive environment necessitates well-defined Construction Environmental Management Plans and Pollution Prevention Plans, which are currently absent. Instead, the application relies on vague mitigation and contingency measures that are to be developed after consent is granted, obstructing any meaningful assessment of their potential effectiveness.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from the proposed seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it is impossible to ascertain the extent and duration of these impacts, or their ecological ramifications. This uncertainty extends to sensitive marine species and habitats that have already been identified in broader assessments.

Additionally, the absence of detailed emergency response procedures compounds these issues. The deferral of essential contingency planning until after consent is granted hinders a proper evaluation of whether adequate safeguards are in place to address potential pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and potential mitigation are assessed prior to consent; if this crucial information is absent, a lawful determination cannot be achieved. The application also fails to demonstrate adherence to policy requirements regarding environmental protection and water quality.

Ultimately, the deficiencies in defined mitigation measures, the lack of comprehensive management plans, and the uncertainty surrounding potential impacts render the assessment materially insufficient. These flaws prevent a thorough evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, which is critical given the rich marine ecosystem and vibrant fishing industry off the West Lewis coast. It fails to adequately protect or maintain these vital habitats while raising concerns about socio-economic impacts. A fundamental flaw lies in the assumption that fishing activities can be easily displaced. The application lacks evidence to show that alternative fishing grounds are both available and capable of accommodating the additional pressure, which poses a risk of overfishing elsewhere and could have detrimental effects on local livelihoods.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated from construction activities. The anticipated long-duration hammer piling is expected to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to minimise the importance of these disturbances, offering insufficient evidence to support its claims.

In a troubling contradiction, the application acknowledges the necessity for licences to allow for potential harm to European Protected Species while simultaneously

describing the anticipated impacts as negligible. This inconsistency casts doubt on the assessment's credibility and raises alarms regarding compliance with the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Additionally, the assessment does not account for the cumulative impacts from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined factors, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

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

In summary, the deficiencies in the assessment regarding fishing displacement, underappreciation of acoustic impacts, and internal contradictions render the evaluation incomplete and unreliable, hindering a thorough understanding of the potential repercussions 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 West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the environmental quality, cultural identity, and tourism value of the area. However, the Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, representing a serious omission. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

This application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Such an omission is particularly concerning considering the significance of dark skies to the area's identity and the potential for emerging tourism sectors like astro-tourism. The failure to consider these factors results in a notable gap in the overall assessment of landscape and environmental impacts.

Furthermore, there is no examination of how the lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and elevate the risk of collisions. The application does not include a lighting impact assessment or a study on phototaxis, meaning that it fails to evaluate the potential effects of aviation lighting on these species and their mortality rates.

This issue is worsened by the dependence on daytime survey data in the ornithological assessment, which does not consider nocturnal activities 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 creates a significant gap in understanding the ecological implications.

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

From a policy standpoint, the absence of such assessments contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is integral to the environment.

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

TOURISM

The Isle of Lewis relies heavily on its tourism sector, which has seen remarkable growth from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and representing up to 16% of the island's economy. Despite this vital contribution, the assessment of tourism impacts within the application is significantly lacking, failing to address the economic and social consequences for this essential part of the local economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are crucial to attracting visitors, yet the application acknowledges that 86% of visitors are drawn by scenery without providing any quantified evaluation of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or overall economic input.

The analysis does not model the potential repercussions of industrialising the seascape and deteriorating environmental quality on Tourism Gross Value Added or the island's broader economic resilience. Consequently, it remains unclear whether the proposed development would produce a net economic benefit or jeopardise a sector that is both established and growing. Furthermore, the critical role of environmental quality in supporting tourism has been overlooked, including the significance of unspoiled landscapes and dark skies for visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding its impact on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently evaluated, which is a requirement under the Islands (Scotland) Act 2018. From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector and lacks the evidence needed for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This deficiency hinders a thorough evaluation of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application reiterates the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable level of industrialisation. It is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

A reliable and comprehensive evidential basis for the determination is not provided within the application. Significant deficiencies exist in baseline data, including the continued use of an unspecified design envelope and an overreliance on unspecified mitigation measures. Furthermore, crucial impact pathways are omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is inadequate, failing to allow for a complete understanding of likely significant effects or residual impacts.

There are also significant procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a substantial omission. These issues inhibit the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is inconsistent with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to provide evidence that health and wellbeing impacts are acceptable and lacks modelling of tourism impacts, which undermines claims of a net economic benefit. The cumulative effects of both offshore and onshore components

have not been adequately assessed, thereby obscuring 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 not only incomplete but also internally inconsistent in certain aspects. The evidential requirement to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

The proposal is set to induce 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, along with impacts on tourism, signify permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information gaps, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is obliged either to refuse consent on these bases or to invoke appropriate regulatory measures to require the submission of the missing information.

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

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: D571FEAD

Member of the public 1496

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and associated documents has revealed serious deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. The development is planned off the west side of the Isle of Lewis, an area cherished for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of this proposal raise urgent concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application lacks a solid evidential basis necessary for a lawful determination. There is a troubling absence of critical environmental data, with baseline information being limited and inconsistent. Moreover, several key components of the proposal remain undefined. The reliance on a flexible design framework obscures a clear understanding of the potential significant effects, and the unspecified nature of mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident in this proposal, which appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to issues of biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate its ability to meet national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and undermine the capacity of the competent authority to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines positioned alarmingly close to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, dependence on undefined mitigation strategies, evidential gaps, and evident policy non-compliance highlight that this application is incomplete and unfit to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that compromise its reliability and transparency regarding the potential environmental effects of the proposal. A key issue arises from the application of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and obstructs a consistent application of a worst-case scenario, thereby undermining the assessment's integrity and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have not been clearly defined. Seeking consent 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 deferral of crucial 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 clearly established prior to any determination.

Additionally, significant gaps exist in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the application presents conclusions of negligible or non-significant effects devoid of robust supporting data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal further fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it does not provide assurance that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies prevent a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determinate decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime requires a thorough assessment of alternatives, yet the current application falls short of this statutory obligation. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it provides a narrative of project evolution that does not adequately identify or assess less harmful options. This significant oversight raises

concerns about the developer's consideration of alternative offshore locations, development scales, and design configurations.

Specifically, the application does not demonstrate that the possibility of situating turbines further offshore, where visual, ecological, and coastal impacts could be lessened, has been seriously considered. The sensitivity of the West Lewis coastline underscores the importance of proximity to shore in evaluating environmental impact. Consequently, the lack of such an analysis casts doubt on the assertion that the proposed siting is indeed the least damaging option available.

Furthermore, the shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been sufficiently explored to mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest a failure to apply mitigation by design, resulting in an overreliance on post-design measures to address potential harm.

As a consequence, the application does not adequately demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This inadequacy represents a deviation from the established mitigation hierarchy, which prevents the competent authority from determining whether more appropriate and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to ascertain if the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a material shortcoming that further supports the conclusion that the application has not been thoroughly evaluated and is incapable of sustaining a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to provide a thorough and trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the existing baseline data is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the evaluation lacks a solid evidential foundation to determine potential impacts.

A significant oversight pertains to otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal regions for foraging and movement. By failing to consider their core foraging range and behavioural patterns, the assessment inadequately addresses the possible

impacts of construction-related disturbance, noise, and increased activity. This oversight undermines any conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks suffers from deficiencies, notably due to reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly incorporate or consider such data leads to an incomplete baseline, thereby weakening the reliability of the conclusions.

The methodological shortcomings mean that conclusions suggesting negligible or non-significant effects are based on assumptions rather than sound evidence. Insufficient baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not accurately 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. In light of these issues, granting consent cannot be legally justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to important seabird populations that are currently experiencing declines. The ornithological assessment fails to adequately demonstrate that these species will not face adverse effects from the proposed development. This site is located within key foraging areas and migratory pathways, yet the application does not thoroughly assess the risks of displacement, collision, or habitat loss for the seabirds.

A key contradiction within the application arises from the developer's assertion that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation, which is only necessary if significant harm is anticipated. This contradiction undermines the reliability of the assessment and raises doubts about the conclusions that have been drawn.

The evidence provided does not sufficiently assure that seabirds associated with

protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. There is inadequate consideration of the significance of these feeding grounds, and reliance on modelling introduces uncertainty, especially for declining species like Kittiwakes and Fulmars. The methodologies used may underestimate mortality rates, particularly when baseline data is lacking and the behavioural responses of the species are not well understood.

The placement of turbines in a designated migratory corridor poses an additional risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of potential mortality within this corridor have not been adequately assessed, nor have the potential impacts on species with small global populations.

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

Furthermore, the deficiencies highlighted show 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 directly contradicts national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity associated with the proposed development is grossly inadequate. It overlooks the West Lewis coastline as a vibrant cultural landscape, where the environment, language, tradition, and community are intertwined. The approach taken in the application reduces heritage to mere static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance.

A notable shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active burial grounds and places of spiritual practice, yet they are mischaracterised as static features. This perspective disregards their continued use and meaning, leading to an incomplete assessment of the cultural effects and neglecting their importance to community life.

Additionally, the assessment does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship the

community maintains with the coastal environment. These elements are vital to the area's identity and are notably absent from the evaluation, representing a significant oversight. Without recognising these factors, it is impossible to fully comprehend the cultural impact of the development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population has a unique cultural identity, characterised as an Indigenous People; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A further procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The lack of this assessment means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

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

In summary, the shortcomings in assessing living heritage, intangible cultural value, community rights, and compliance with statutory obligations create a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a sound basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is critically flawed and lacks the necessary transparency for a legally sound assessment. Although the developer undertook a Social Impact Assessment that included focus groups with local residents, the comprehensive report remains unpublished. This lack of availability creates a significant evidential gap, inhibiting both public scrutiny and the competent authority's understanding of the full range of social risks identified in the developer's research.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct community engagement and are therefore grounded in reality, not conjecture. Nevertheless, the absence of the full assessment restricts proper examination of these findings and hampers the determination of their relevance in the decision-making framework.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings noting "cultural loss." Despite this, such impacts have not been adequately incorporated into the main application nor afforded the appropriate consideration. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is essential for projects of this magnitude, especially where community identity and functionality may be at risk. The failure to provide the complete data set undermines the application, leaving it without a robust evidential foundation for evaluating the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the evidence currently available suggests the existence of adverse effects that have not been fully acknowledged. Without the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a significant omission in the application and signifies a failure to satisfy the evidential obligations of 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 leads to an incomplete and unreliable evaluation. This scenario precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not adequately portray the sensitivity of the receiving environment or the scale of change involved. The coastline of West Lewis is characterised by an expansive Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines situated close to the shoreline would establish a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to properly convey the magnitude of visual change associated with the turbines. Their scale and proximity would dominate the views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within

the context of such a sensitive landscape.

Concerns also arise from the selection and presentation of visual viewpoints within the assessment. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the visual impact has been underestimated, thereby compromising the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation rather than acknowledging their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This presents not just a visual impact but a wider cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historical assets. The extent of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a comprehensive worst-case scenario analysis further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks crucial detail necessary for a comprehensive understanding of the environmental risks associated with construction and pollution. Significant seabed preparation and installation activities are proposed within a challenging high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans presented. Instead, the application relies on unspecified mitigation and contingency measures that would be

prepared only after consent is granted, which severely limits the ability to assess their adequacy or effectiveness at this stage.

Particularly alarming is the proposal's failure to adequately consider the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are susceptible to sediment disruption and contamination. While the application acknowledges the potential risks of sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail the preventative, control, or monitoring measures that would be put in place to address these risks.

There is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these disturbances. This uncertainty extends to potential impacts on marine species and habitats, which have already been identified as sensitive within the broader assessment context.

Moreover, the absence of detailed emergency response procedures adds to the growing concerns surrounding this application. By postponing contingency planning until after consent, the proposal hinders an evaluation of whether adequate safeguards are established for responding to pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess the environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short of demonstrating compliance with policy requirements related to environmental protection and water quality.

In summary, the application's deficiencies—including the lack of defined mitigation measures, the absence of detailed management plans, and uncertainties surrounding potential impacts—render the assessment materially inadequate. These issues prevent a solid evaluation of construction and pollution risks and support the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application in question does not sufficiently evaluate the ecological or socio-economic impacts associated with these vital resources. It fails to convincingly demonstrate that existing habitats and fishing activities can be protected or maintained without facing significant disruption.

A critical flaw within the application is its assumption that fishing activities can be displaced without any adverse consequences. There is no evidence provided that

alternative fishing grounds are available or that they can handle the additional pressure resulting from such displacement. This lack of information is particularly concerning, as it risks overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The absence of a detailed and evidence-based assessment inhibits a proper understanding of the potential impacts on both fisheries and local livelihoods.

Moreover, the proposal poses considerable risks to marine species due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over vast areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application seems to downplay these effects without adequate supporting evidence.

There are also inconsistencies within the application itself, particularly regarding the necessity for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially in scenarios where harm is predicted to a degree necessitating legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A lack of thorough evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions cannot be determined effectively.

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

In summary, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment collectively render it incomplete and unreliable. This results in an inability to conduct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of onshore infrastructure is fundamentally lacking and does not encompass the full range of impacts that stem from a singular integrated project. The offshore turbines and the onshore works are closely interconnected; however, they are being assessed in isolation, leading to a disjointed approach that masks the actual magnitude of environmental and socio-economic repercussions.

Among the onshore components are cabling across protected moorland, the

construction of a substation near Stornoway, and the necessary access routes through fragile landscapes. These activities necessitate excavation in areas rich in deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to deliver a thorough assessment of these ramifications, hindering a complete understanding of the project's total environmental footprint.

Furthermore, the exclusion or postponement of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be evaluated collectively. However, the segmentation of offshore and onshore components results in a lack of understanding regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not confirm that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been taken, thereby leaving a significant evidential gap in terms of biodiversity conservation.

Concerns also arise regarding the carbon balance, as the disturbance of peatland releases previously stored carbon, potentially resulting in a carbon debt that undermines the goals of renewable energy initiatives. The application does not sufficiently tackle this issue or establish that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with current land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on its deliverability and legal execution.

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

In summary, the disaggregation of project elements, the absence of a thorough assessment, and the insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include any evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are important for environmental quality, cultural identity, and tourism. The proposed development would introduce permanent

red aviation lighting that would be visible from long distances, creating a persistent and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

Moreover, the application fails to consider the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The importance of dark skies for the area's identity and for growing tourism sectors like astro-tourism cannot be overstated. The lack of assessment creates a gap in the overall landscape and environmental evaluation.

There is also no assessment of how nocturnal wildlife may be affected. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not contain any lighting impact assessment or phototaxis study, failing to address how the aviation lighting may affect these species or contribute to increased mortality.

This issue is aggravated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and associated risks. Kittiwakes, for example, may forage or migrate at night and could also be disoriented by artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data leads to a critical gap in understanding ecological effects.

Without an assessment of the impacts on nocturnal wildlife, 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, thereby invoking the precautionary principle and hindering 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 overall assessment of landscape and seascape impacts, as the character of night-time environments is essential to the broader context.

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

SUMMARY

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

community wellbeing, the proposal falls short.

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

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

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

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

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

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

Additional Comments

I am utterly sickened by the greed driving these projects to the clear and enormous detriment to the natural environment, and the reprehensible behaviour of politicians

ignoring and over-ruling objections because of their personal interests.
These projects need to be stopped. That's all there is to it.

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: E02C5CF3

Member of the public 1497

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 lacks a full, transparent, and reliable account of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts presented may not accurately reflect the actual development constructed, which obstructs both the public and the competent authority from comprehending the true extent of the environmental effects.

Furthermore, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consent is thus being sought with the understanding that any environmental harm will be addressed at a later stage, which precludes a meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and is contrary to the objectives of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation are clearly established prior to any determination.

There are also major evidential shortcomings, such as gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are 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 be reconciled with statutory requirements.

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

Collectively, 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 deficiencies prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority is not equipped to determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a comprehensive evaluation of alternatives, which is crucial under the Environmental Impact Assessment regime. Instead of a systematic,

evidence-based comparison of realistic alternatives that considers environmental effects, it offers a narrative on the project's evolution. This lack of structure fails to show that less harmful options have been adequately identified, assessed, and chosen over more damaging solutions.

Moreover, the application does not transparently compare alternative offshore locations, development scales, or design configurations. Specifically, it does not prove that the developer has earnestly contemplated placing turbines further offshore, where impacts on visual aesthetics, ecology, and coastal environments might be less severe. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in evaluating impacts, the absence of such analysis means one cannot conclude that the proposed siting is the least damaging option available.

The shortcomings also pertain to cable routing and landfall assessments, where there is a lack of evidence showing that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive areas. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis imply that mitigation by design has not been sufficiently implemented, relying instead on measures to mitigate effects after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout decisions, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from determining whether more appropriate and less harmful alternatives might exist. Without a thorough assessment of alternatives, it cannot be asserted that the proposal aligns with sustainable development or relevant policy criteria.

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant shortfall that ultimately leads to the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species related to the application lacks completeness and reliability, failing to adequately understand the ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the baseline data provided is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, there is insufficient evidential support for evaluating potential impacts.

A significant shortfall in the assessment is the inadequate recognition and evaluation of

otters, which are classified as a European Protected Species. The application does not consider their active usage of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural habits results in an incomplete understanding of the possible effects of construction-related disturbance, noise, and increased activity. This lack of assessment weakens any claims regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks is also flawed, primarily due to an over-reliance on aerial surveys that introduce a considerable detection bias, especially under Atlantic conditions. This approach is likely to underestimate their presence, particularly when contrasted with established land-based observations which show frequent use of these waters. The neglect to incorporate or adequately consider such relevant data results in a deficient baseline, further undermining the reliability of the conclusions drawn.

The methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The degree of uncertainty introduced by these deficiencies prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these factors, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the ornithological assessment associated with the application is significantly flawed, presenting serious gaps in evidence and internal contradictions that undermine its findings. The development is sited within crucial foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the risks of displacement, collision, or habitat loss for these species.

The application presents a fundamental contradiction, stating that there are no significant adverse effects while simultaneously making a Habitats Regulations

derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that its conclusions lack proper support from the available evidence. Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It inadequately considers the significance of these feeding grounds and relies on modelling approaches that introduce uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses remain poorly understood.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional and serious risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor, along with potential impacts on species with limited global populations, are not sufficiently assessed in the application.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and modelling constraints indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby precluding a lawful conclusion in support of consent. The identified deficiencies also demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and collectively affirm that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided for the proposed development overlooks vital aspects of cultural heritage and community identity, particularly in relation to the West Lewis coastline. This area embodies a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these dynamic relationships, the application reduces heritage to a collection of static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming in the assessment is its treatment of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries serve as active sites of burial and spiritual practice, yet they are presented as static features, disregarding their continued use and the implications of development on their

surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks the role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship that the community has with the coastal environment. These elements are critical to the area's identity but are completely missing from the assessment, indicating a significant oversight. Without acknowledging these factors, the full cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised under the characteristics of an Indigenous People, 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 does not adhere to established principles for participation in matters that affect cultural and environmental interests.

Additionally, there is a critical procedural flaw due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination of the application.

From a policy standpoint, these oversights create direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, and the recognition of living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and the necessary statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing represents a significant concern and undermines the lawful evaluation of the proposal. The developer commissioned a Social Impact Assessment, including focus groups with local residents, yet has not published the full report. This has resulted in a substantial evidential gap that prevents both the public and the competent authority from fully understanding the social risks identified in the developer’s own research.

Residents are already reporting measurable stress, anxiety, and concern regarding the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. However, the inability to access the complete assessment

hampers proper scrutiny of the findings and restricts the capacity to evaluate their significance within the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” appearing in the developer’s findings. Despite this, such impacts have not been adequately integrated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. It is crucial to obtain a complete understanding of social, economic, and health impacts for developments of this scale, particularly when community character and functioning may be at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and harms due to the absence of the full dataset.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is not possible.

The procedural implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This is a material omission within the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on seascape, landscape, and visual aspects is significantly lacking, failing to adequately address both the extent of change anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines situated near the shoreline threatens to create a continuous and overt industrial presence, which would fundamentally disrupt this character and lead to a permanent and irreversible alteration of the landscape.

Furthermore, the application does not sufficiently capture the degree of visual change expected. Given the scale and proximity of the turbines, they would dominate views

from residential areas, historic sites, and frequently visited coastal locations. This domination would directly affect visual amenity while compromising the essential qualities of naturalness and remoteness. The assessment fails to accurately convey the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and portrayal of visual viewpoints. Evidence indicates that these viewpoints might not adequately represent the most sensitive receptors or the most adverse scenarios, particularly in relation to vital cultural heritage sites and landscapes of high value. Such shortcomings suggest that the estimated magnitude of visual impact may have been downplayed, leading to questions regarding the reliability of the overall assessment.

Additionally, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as 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 regards these as separate entities rather than acknowledging their interdependence, resulting in a partial evaluation of their setting and cultural importance.

The proposed industrialisation of the seascape threatens to sever these relationships, altering the manner in which heritage assets are perceived and disrupting their association with the natural horizon. This impact transcends visual concerns, embodying a more extensive cultural and spatial detriment that has not been adequately evaluated within the application.

In terms of policy implications, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated scale of change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a thorough worst-case scenario assessment further undermines any assertion of adherence to policy.

Moreover, 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 inescapable. Consequently, the change brought about is fundamental and enduring, rather than something that could be diminished to an acceptable degree through mitigation efforts.

In summary, the assessment does not accurately depict the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and bolster the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is inadequate and lacks the necessary detail to assess the likely environmental impacts. The project entails

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, the application relies on future mitigation and contingency measures that are to be developed post-consent, making it impossible to assess their sufficiency or effectiveness meaningfully.

This dependence on unspecified future actions is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disruption and contamination. While the application recognises risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on the prevention, control, or monitoring of these issues.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also 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 further exacerbates these concerns. By postponing contingency planning to a later stage, the application hinders the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and undermines the capability of the competent authority to evaluate environmental protection measures at the time of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of specified mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts render the assessment fundamentally deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment fails to provide a thorough evaluation of fisheries and marine life, lacking a robust analysis of both 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 application does not adequately demonstrate how these habitats and activities can be safeguarded from significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to suggest that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This significant oversight increases the risk of overfishing in other areas, which could have broader economic repercussions for the local fishing fleet. Without a sound and evidence-based evaluation, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling for an extended duration is expected to cause disturbances over large distances, negatively impacting species such as dolphins. The anticipated disruption to a considerable proportion of the local bottlenose dolphin population raises serious concerns; yet, the application minimizes the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially where harm is expected to a degree that warrants legal authorisation.

Furthermore, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential, as it is critical to understanding 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 illustrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus preventing 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 contradictions render the assessment inadequate and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnected nature of the offshore turbines and onshore works. This fragmented evaluation obscures the full extent of the environmental and socio-economic impacts associated with this single integrated project.

Critical onshore elements include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together; however, the disaggregation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that these habitats have been fully evaluated or that appropriate avoidance measures are in place, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland may release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. This issue is not adequately addressed in the application, which fails to prove that the overall carbon balance remains advantageous.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant omission. The proposal to introduce permanent red aviation lighting has the potential to create a continuous and

intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline, an area noted for its exceptionally dark skies, which contribute to its environmental quality, cultural identity, and tourism value.

Moreover, the application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing importance of dark skies to local identity and emerging tourism sectors, such as astro-tourism. The failure to adequately consider these factors creates a significant gap in the overall landscape and environmental assessment.

Of even greater concern is the lack of evaluation regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not present any lighting impact assessment or phototaxis study, leading to an inability to assess how aviation lighting may impact these species or contribute to increased mortality rates.

Additionally, the ornithological assessment's reliance on daytime survey data fails to address nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting. The lack of site-specific night-time data represents a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions are in conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. This oversight further undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral element of the overall ecological framework.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that caused the

rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable in terms of the scale of industrialisation. This current application is presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

The application lacks a complete and reliable evidential basis for decision-making. There are significant gaps in baseline data, it utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it fails to address key impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. As a result, the Environmental Impact Assessment is incomplete, inhibiting a full 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 duties under the Islands (Scotland) Act 2018. Additionally, not disclosing the full Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of offshore and onshore elements have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain unclear and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, preventing a lawful conclusion that the 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, disruption of cultural and visual relationships, and impacts on tourism represent permanent changes that cannot be effectively mitigated.

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

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is denied 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: 2CBDD48C

Member of the public 1498

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant material deficiencies in planning, environmental consideration, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide an adequate evidential basis for lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the development's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines situated 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 measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided in the application is fundamentally flawed, particularly regarding the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. Instead of recognising these relationships, the application adopts a reductive perspective, treating heritage as a collection of isolated, static assets. Such an approach fails to acknowledge the ongoing social, cultural, and spiritual roles these elements play within the community.

A significant shortcoming is evident in how the assessment treats culturally important sites, specifically the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as mere static features. This misrepresentation ignores their continued use and significance, as well as the potential impacts of the proposed development on their surroundings. Consequently, the evaluation of cultural effects remains incomplete, overlooking the cemeteries' essential role in community life.

Additionally, the application neglects to consider intangible cultural heritage elements, which include the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, representing a major oversight. Without addressing these components, a comprehensive understanding of the cultural impact of the development is unattainable.

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. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles of participation in decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, a statutory requirement 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 of the proposal.

From a policy standpoint, these identified deficiencies directly conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside a recognition of living cultural practices, signifies a clear deviation from policy obligations.

In conclusion, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory requirements create a significant evidential gap. The cultural impacts of the proposed development have not been adequately

evaluated, and the application fails to provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The concerns surrounding social impacts, health, and wellbeing related to the proposal are profound and merit urgent attention. A significant evidential gap exists due to the lack of transparency in the developer's Social Impact Assessment, which remains unpublished despite having included focus groups with local residents. This omission hinders both public understanding and the competent authority's ability to evaluate the potential social risks highlighted by the developer's own research.

Available summaries reveal that local residents are suffering from measurable stress, anxiety, and concern linked directly to the proposal's scale and proximity. These findings stem from direct community engagement and are thus grounded in reality, yet the lack of access to the comprehensive assessment limits scrutiny and fails to inform the decision-making process adequately.

Additionally, there is a growing perception among residents that the proposal threatens community identity and cohesion, with references to "cultural loss" appearing in the developer's findings. Alarmingly, these critical social impacts have not been incorporated into the application or given due consideration, further obscuring the true human and social costs of the development.

Such a lack of transparency disrupts the Environmental Impact Assessment process, as a complete understanding of social, economic, and health ramifications is vital for developments of this magnitude, especially when they could alter community character and functioning. Without the full dataset, the application fails to offer a comprehensive evidential basis to weigh benefits against harms.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence currently indicates existing adverse effects that remain undisclosed. Consequently, the absence of the full assessment prevents any demonstration of compliance with this critical policy.

The procedural implications are equally troubling. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This material omission highlights a significant failure to meet the evidential standards required under the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and the presence of existing adverse impacts leaves the assessment incomplete and unreliable. Such deficiencies obstruct a lawful determination and underscore the reality that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed turbines is fundamentally inadequate, failing to capture the scale of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would establish a persistent industrial presence that would irrevocably alter this character and lead to a permanent transformation of the landscape.

Furthermore, the application does not accurately depict the extent of this visual change. The size and proximity of the turbines would dominate views from local residential areas, historical sites, and popular coastal locations. This would significantly affect visual amenity and undermine the landscape's defining features of naturalness and remoteness. The assessment fails to properly articulate the significance of these impacts within such a sensitive landscape.

There are serious methodological flaws in how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning critical cultural heritage sites and high-value landscapes. This raises concerns that the true magnitude of visual impact has been downplayed, compromising the assessment's reliability.

Additionally, there is a notable failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence, which leads to an incomplete understanding of how the proposal will impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are appreciated and severing their ties to the natural horizon. This is not merely a visual issue; it represents a wider cultural and spatial detriment that has not been properly evaluated in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historical assets. The scale of the proposed change fails to meet the necessity of preserving landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further undermines any assertion of compliance with policy.

Moreover, it is evident that the impacts noted cannot be effectively mitigated. Given the height, scale, and proximity of the turbines, their presence would be imposing and inescapable. The anticipated changes are therefore fundamental and permanent, rather than amenable to acceptable levels of mitigation.

In summary, the assessment does not accurately reflect the magnitude of impact, the

sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings preclude a dependable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

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

I want future generations to be able to enjoy the landscape I was fortunate enough to grow up surrounded by.

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: A7A4AFA2

Member of the public 1499

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

Dear Sir/Madam

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

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

Additionally, there are substantial policy conflicts. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests for consent and undermine the competent authority's ability to determine the development's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive, transparent, or dependable evaluation of the likely environmental effects associated with the proposal. A critical issue is the adoption of a flexible Project

Design Envelope, which lacks fixed turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the effective application of a worst-case scenario approach, thus compromising the reliability of the assessment. As a result, the impacts reported may not accurately portray what will be constructed, which obstructs both public understanding and the competent authority's ability to grasp the true scale of environmental effects.

There is a heavy reliance on undefined mitigation measures, monitoring strategies, and management plans within the application. Seeking consent based on the premise that environmental damage will be mitigated at a later date is unacceptable, as it inhibits any substantive evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of critical information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be explicitly identified prior to any determination.

Significant evidential gaps are present, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than robust site-specific evidence. This lack of comprehensive information generates uncertainty about the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are drawn without adequate supporting data. The insufficiency of information hampers the understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it fails to show that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a proper assessment of alternatives, which is required by the Environmental Impact Assessment regime. Instead of presenting a structured comparison of realistic alternatives based on their environmental effects, it offers a narrative of project development. This method does not show that less harmful options have been adequately identified, assessed, or chosen over more damaging ones.

There is a lack of clear, evidence-based comparisons of different offshore locations,

development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered placing turbines further offshore, where impacts on visual, ecological, and coastal aspects would likely be less severe. Given the sensitivity of the West Lewis coastline and the importance of proximity to the shore in evaluating impact, the failure to include this analysis prevents any conclusion that the proposed siting is the least damaging option.

The problems also extend to the cable routing and landfall assessment. There is insufficient evidence that alternative routes have been explored to avoid or lessen impacts on sensitive areas, including cultural and spiritual sites like Barvas Cemetery. The lack of a clear strategy to avoid impacts and the absence of comparative analysis imply that mitigation through design has not been effectively applied. Instead, the reliance appears to be on measures taken after design.

Consequently, the application does not demonstrate that environmental harm has been reduced through careful site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to determine if less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or aligns with policy requirements.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to provide a full understanding of the ecological receptors in the West Lewis coastal area. This environment is biologically active and sensitive, yet the data collected is incomplete and the methods used do not effectively capture information about species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable basis for evaluating potential impacts.

A significant oversight involves otters, which are a European Protected Species. The application does not adequately recognise or evaluate their use of coastal areas for foraging and movement. This omission, particularly regarding their core foraging range and behaviour, means that the effects of construction disturbance, noise, and increased activity have not been properly assessed. Thus, any claims of negligible effects on this species lack substantiation.

There are also notable shortcomings in the assessment of basking sharks. The reliance on aerial surveys has created significant detection bias, especially under Atlantic conditions. This method likely underreports the presence of basking sharks, especially

when compared to established land-based observations that show they frequently utilise these waters. The failure to consider this data leads to an incomplete baseline and diminishes the reliability of the findings presented.

These methodological flaws mean that any conclusions indicating negligible or non-significant effects are based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty raises concerns about the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or 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, thereby invoking the precautionary principle. In this context, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These issues impede a thorough evaluation of impacts on marine ecology and protected species, ultimately demonstrating that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development includes the siting of turbines within key foraging areas and a recognized migratory corridor on the west coast of the Isle of Lewis, which supports internationally important seabird populations. These populations are already experiencing declines, yet the ornithological assessment provided fails to demonstrate adequately that they will not be adversely affected. The assessment lacks sufficient evidence regarding the impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The methodologies employed introduce significant uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline.

A fundamental contradiction arises within the application itself, as the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, a process required when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that its conclusions are unsupported by the evidence presented. The siting of turbines within a primary flight path poses an additional significant risk, creating a barrier for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed.

From a regulatory standpoint, the application does not meet the evidential threshold to conclude 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 met. This invokes the

precautionary principle, obstructing any lawful conclusion in favour of consent. Moreover, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and safeguarding natural assets. The proposal's inability to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

Overall, the assessment's internal inconsistencies, methodological flaws, and inadequate evidence render it unreliable. These shortcomings prevent a thorough evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is alarmingly inadequate, notably failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application employs a reductive method, viewing heritage merely as a collection of isolated, static entities instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Particularly troubling is the treatment of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active places for burial and spiritual practices, yet they are mischaracterised as static features, ignoring their continued significance and the implications of development on their settings. This fundamental misunderstanding leads to an incomplete assessment of cultural effects and neglects the essential role these sites play in community life.

Moreover, there is a glaring omission in the consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity yet are completely overlooked in the assessment. This oversight prevents a comprehensive understanding of the cultural impacts stemming from the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity and bears characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of genuine engagement undermines the credibility of the assessment and overlooks established principles of participation in matters affecting cultural and environmental interests.

A significant procedural shortcoming is the absence of a valid Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to analyse the social, cultural, and economic impacts on the island community. This single omission renders the determination process unlawful.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The failure to incorporate both tangible and intangible heritage, along with the disregard for living cultural practices, constitutes a clear violation of policy mandates.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and legal obligations culminates in a substantial evidential gap. The cultural implications of the proposed development have not been adequately examined, and the application falls short of providing a solid foundation for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment is a significant oversight that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the lack of transparency surrounding the complete report creates a substantial evidential gap. This deficiency not only inhibits the public's understanding of the risks identified but also restricts the competent authority's ability to perform a thorough evaluation of the proposal.

Summaries that are available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are grounded in direct engagement with the community and are not speculative in nature. However, without access to the full assessment, the findings cannot be adequately scrutinised, thereby limiting the determination of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet these critical impacts have not been sufficiently incorporated into the main application or given the necessary weight. The decision to withhold the complete Social Impact Assessment obscures the true human and social cost associated with the development.

The lack of transparency has a detrimental effect on the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The omission of the full dataset means that the application lacks a complete evidential basis for assessing the balance between the proposed benefits and potential harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence presented suggests existing adverse effects that remain undisclosed. In the absence of the complete assessment, compliance with these policy objectives cannot be affirmed.

The implications of this procedural inadequacy are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This situation constitutes a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the combination of non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation ultimately obstructs a lawful determination and confirms that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

spatial harm that has not been sufficiently assessed in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

Compounding these issues is the lack of detailed emergency response procedures. By

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

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

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

FISHERIES AND MARINE LIFE

The application does not provide a robust evaluation of ecological or socio-economic impacts regarding fisheries and marine life. It is critical to note that the waters off the West Lewis coast support a vibrant marine ecosystem alongside an active fishing industry. However, the application fails to adequately demonstrate that these vital uses and habitats can be protected or maintained without significant disruption.

A significant concern arises from the assumption that fishing activity can simply be displaced without repercussions. The application offers no evidence to suggest that alternative fishing grounds are available, accessible, or capable of bearing additional pressure. This oversight is crucial because the risk of overfishing in other areas looms large, along with potential wider economic impacts on the local fishing fleet. Without a clear, evidence-based assessment, the implications for fisheries and livelihoods cannot be properly understood.

Moreover, the proposal brings substantial risks to marine species, particularly due to the underwater noise that will be generated during construction. High-energy hammer piling for prolonged periods is expected to cause disturbances over extensive areas, negatively impacting species such as dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population raises alarming concerns, yet the application seems to trivialise these effects without adequate supporting evidence.

There exists a troubling inconsistency within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged, even as impacts are simultaneously characterised as negligible. This contradiction undermines

the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where anticipated harm may require legal authorisation.

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

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

In summary, the deficiencies evident in the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings prevent a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant concerns regarding the incomplete assessment of onshore infrastructure and its associated impacts, which are crucial for understanding the entirety of this integrated project. The offshore turbines and the onshore works are inherently connected, yet the current evaluation treats them as separate entities. This fragmented assessment obscures the true extent of environmental and socio-economic effects.

Onshore works encompass cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is ecologically sensitive and serves as a significant carbon store. The lack of a comprehensive assessment of these impacts fails to provide a full understanding of the project's overall environmental footprint.

The application's decision to exclude or defer the assessment of onshore impacts inhibits a thorough evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be examined collectively. However, the disjointed consideration of offshore and onshore aspects means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been comprehensively

evaluated, nor does it outline appropriate avoidance measures, leading to significant gaps in biodiversity protection.

Concerns are also raised regarding carbon balance due to the disturbance of peatland, which releases stored carbon and potentially incurs a carbon debt. This situation stands in opposition to the goals of renewable energy development. The application fails to address this matter adequately, nor does it show that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is no evidence that the requisite consents or processes have been initiated, raising doubts about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project holistically, alongside the inability to demonstrate protection for peatlands, habitats, and land use interests, contradicts the National Marine Plan and National Planning Framework 4. The lack of evidence regarding the avoidance or mitigation of impacts further undermines the application.

In summary, the disconnection of project components, the absence of a thorough assessment, and insufficient evidence related to environmental and land use impacts render this section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the role of dark skies in the area’s identity and the potential growth of astro-tourism. The lack of consideration for these impacts creates a notable gap in the overall landscape and environmental assessment.

Furthermore, the proposal does not assess the effects of artificial lighting on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are at risk of disorientation and collision due to phototaxis, yet the application omits any lighting impact assessment or phototaxis study. This means there is no analysis of how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, also face the risk of disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. This failure also undermines the overall assessment of landscape and seascape impacts, as night-time character is a vital component of the environment.

In summary, the complete absence of assessments concerning dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit to support a lawful determination.

TOURISM

The tourism sector on the Isle of Lewis plays a vital role in the local economy, having expanded from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application in question exhibits a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social repercussions for this key sector. Despite the application's acknowledgment that 86% of visitors are attracted by the area's scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Furthermore, the assessment does not address the critical role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and supporting emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the potential impacts on an acknowledged and expanding segment of the local economy.

The implications of the inadequate assessment extend to the wider community, given the island's limited economic diversification. The failure to consider tourism impacts raises concerns regarding employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the requirement to provide evidence of net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, thereby lacking the necessary information for the competent authority to adequately assess the economic implications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, analysing environmental factors that drive visitor behaviour, and acknowledging the island's economic dependency culminate in a significant evidential void. This gap obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: 157ECA8D

Member of the public 1500

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the relevant marine licensing and Environmental Impact Assessment frameworks. It highlights significant deficiencies across planning, environmental, cultural, and procedural dimensions. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal emerge due to its potential incompatibility with statutory requirements, national policy, and sustainable development principles.

A critical issue lies in the application's inadequate evidential basis for a lawful determination. There is a notable absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The proposal's flexible design framework hinders a clear assessment of likely significant effects. Reliance on unspecified mitigation measures precludes an evaluation of their potential effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Moreover, there are evident and substantial conflicts with established policies. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate adherence to national obligations aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's policy acceptability.

The unprecedented scale of the proposal raises further alarm, with large turbines positioned uncomfortably close to the shoreline, which introduces serious concerns related to landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, dependence on undefined mitigation, evidential shortcomings, and clear policy discrepancies illustrate that the application is incomplete and incapable of facilitating a lawful determination. In light of these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined Project Design Envelope, which lacks specific commitments regarding turbine dimensions, layouts, or configurations. This introduces substantial uncertainty that hinders the application of a worst-case scenario analysis. Consequently, the integrity of the Environmental Impact Assessment Report is compromised, failing to accurately reflect the potential environmental impacts of the proposed development. As a result, both the public and the competent authority are left without a clear understanding of the actual extent of these impacts.

Furthermore, the application depends heavily on unestablished mitigation measures, monitoring strategies, and management plans. This approach seeks consent under the premise that any environmental harm will be addressed at a later date, thereby obstructing a thorough evaluation of the effectiveness of such measures and the assessment of any residual impacts. The deferral of critical information to post-consent stages is procedurally unacceptable, contradicting the fundamental aims of the Environmental Impact Assessment framework, which mandates that significant effects and corresponding mitigation strategies be clearly delineated prior to the determination of applications.

Significant evidential deficiencies are evident, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This situation gives rise to uncertainty regarding both the scale and significance of the impacts, particularly in cases where conclusions of negligible or non-significant effects are asserted without adequate supporting data. Such a lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, thereby introducing a degree of scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application fails to satisfy the evidential standards necessitated by the Habitats Regulations, particularly regarding the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the invocation of the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic alternatives based on environmental effects but instead offers a narrative account of project evolution. This method does not sufficiently demonstrate that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, an approach that would likely lessen visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the significant impact of proximity to shore, the absence of such analysis prevents any conclusion that the proposed siting represents the least damaging option.

These inadequacies also extend to cable routing and landfall assessments, where there is 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 lack of a clear avoidance strategy and comparative analysis indicates that mitigation by design has not been effectively employed, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This constitutes a failure to adhere to the established mitigation hierarchy, thus hindering the competent authority's ability to ascertain 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 perspective, this inadequacy 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 omission that leads 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 concerning marine ecology and protected species reveals significant deficiencies that undermine its reliability and effectiveness. This coastal environment of West Lewis is particularly sensitive and biologically rich, yet the baseline data presented is inadequate. The methodologies used fail to comprehensively capture the presence, behaviour, and habitat usage of key species. Consequently, this shortfall renders any assessment of impacts to be speculative rather than grounded in solid evidence.

Otters, classified as a European Protected Species, are notably overlooked in this assessment. The application neglects to properly evaluate their active foraging and

movement patterns along the coast. The absence of an assessment of their core foraging range means that potential disturbances from construction activities, noise, and increased human presence have not been sufficiently evaluated. This oversight fundamentally weakens any claims made regarding the lack of significant effects on otters.

In addition, the evaluation of basking sharks suffers from methodological flaws. The reliance on aerial surveys, particularly in challenging Atlantic weather conditions, introduces a significant bias in detection rates. This approach is likely to underestimate the actual presence of basking sharks in the area, especially when juxtaposed with established land-based observations that highlight their frequent utilisation of these waters. Such omissions further compromise the baseline data and diminish the credibility of the conclusions drawn.

The inadequacies in methodology result in conclusions of negligible or non-significant effects that are more reliant on assumptions than on robust scientific evidence. Furthermore, the lack of adequate baseline data hampers the ability to assess cumulative and indirect impacts, seasonal variations, and interactions within the wider ecosystem. This creates a substantial degree of uncertainty regarding the real risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the obligations set out in the Environmental Impact Assessment regime and National Planning Framework 4. The failure to appropriately identify and assess protected species leads to heightened uncertainty, making it impossible to exclude adverse effects beyond reasonable scientific doubt. The application thus engages the precautionary principle, indicating that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally unreliable ornithological assessment, marked by significant gaps in evidence and contradictions that call its conclusions into question. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, already in decline, reside. Despite this, the assessment fails to demonstrate convincingly that these species will not suffer adverse effects. The implications of displacement, collision risk, or habitat loss have not been adequately evaluated.

There is a crucial inconsistency within the application itself. While the developer concludes that there are no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which only arises when significant harm is

anticipated. This contradiction further undermines the reliability of the assessment and indicates that the conclusions drawn lack support from the underlying evidence.

Moreover, the assessment does not adequately substantiate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully considered, and the reliance on modelling methodologies introduces substantial uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. It is likely that mortality rates are underestimated due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term effects of sustained mortality within this corridor are not adequately assessed, raising concerns for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and precludes a lawful conclusion in support of consent.

Additionally, the identified deficiencies contravene 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 creates a direct conflict with national policy.

In summary, the assessment is rendered unreliable by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies hinder a robust evaluation of potential impacts and support the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline must be recognised as a living cultural landscape, where environment, language, tradition, and community are closely intertwined. Unfortunately, the assessment provided in the application is fundamentally inadequate, as it adopts a reductive approach that treats cultural heritage as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice, yet they have been mischaracterised as static features in the assessment. This failure to acknowledge their continued use and the impact of

development on their setting leads to an incomplete evaluation of cultural effects and disregards their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage elements, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These factors are central to the area's identity, yet they are entirely absent from the assessment, representing a significant omission that impedes a proper understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, characterised as 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 fails to reflect the established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, making it impossible to make a lawful determination.

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

In conclusion, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not provide a sufficient basis for evaluating 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.

CONSTRUCTION AND POLLUTION RISKS

The absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. This deficiency obstructs a robust evaluation of construction and pollution risks and underscores the conclusion that the application is incomplete.

The proposal involves considerable seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application leans on mitigation and contingency measures that would be created after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters

and significant habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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 extends to the 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 stage, the application precludes an evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed before consent; when such information is absent, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements relating to environmental protection and water quality.

FISHERIES AND MARINE LIFE

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

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

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

Additionally, the assessment neglects to take into account cumulative impacts that stem from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately gauged.

From a policy standpoint, the proposal does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to provide evidence that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus precluding any conclusion regarding its status as sustainable development.

Overall, the shortcomings in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These inadequacies obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed infrastructure is significantly deficient, failing to acknowledge the comprehensive impacts stemming from a project that is fundamentally integrated. The offshore turbines are interconnected with the onshore operations, yet the two are evaluated in isolation, leading to a disjointed understanding that masks the overall environmental and socio-economic ramifications.

The onshore components encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the development of necessary access routes through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which serves as a critical carbon repository and an ecologically fragile environment. Without an exhaustive evaluation of these impacts, a full comprehension of the project's environmental footprint remains elusive.

Moreover, the omission or postponement of onshore impact assessments obstructs a thorough appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all facets of a project should be assessed collectively; however, the distinct treatment of offshore and onshore components results in a lack of clarity regarding the combined repercussions on peatlands, habitats, and local communities.

There are grave concerns surrounding the potential risks to sensitive habitats, including

machair systems and peatland environments that are under policy protection. The application does not sufficiently demonstrate that these impacts have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential void in relation to biodiversity safeguarding.

Additionally, the routing of infrastructure through active croft land raises possible conflicts with existing land use and legal rights. The application lacks evidence that requisite consents or processes have been pursued, bringing into question the feasibility and lawful execution of the project.

From a policy standpoint, the disjointed assessment of the project and the failure to show protection for peatlands, habitats, and land use interests contravene the principles outlined in the National Marine Plan and National Planning Framework 4. The inability to illustrate that impacts can be circumvented or mitigated further undermines the validity of the application.

Collectively, the fragmentation of project components, the absence of a thorough assessment, and the lack of supporting evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application neglects to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of residents and visitors. This oversight is particularly concerning, as dark skies play a crucial role in the area's identity and in the development of emerging tourism sectors, such as astro-tourism. The omission leads to a clear gap in the overall landscape and environmental assessment.

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

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not reflect nocturnal activity or the associated risks. Species

such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential impact remains unassessed. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, this neglect undermines the broader assessment of landscape and seascape impacts, as the night-time character is an integral aspect 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 renders the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It

does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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 the impacts on tourism represent permanent changes that cannot be mitigated adequately.

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, along with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or invoke the necessary regulatory measures to mandate the submission of the missing information.

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

Additional Comments

The public should have been consulted properly - this is public space and it is our duty to protect it for future generations.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4FB560F9

Member of the public 1501

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

Dear Sir/Madam

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment fails to adequately identify and evaluate protected species, specifically otters, which are a European Protected Species. The application does not recognise their foraging and movement patterns along the coast. This oversight means

that the potential impacts from construction activities, noise, and increased human presence have not been properly assessed. Consequently, the conclusions regarding the lack of significant effects on otters are not credible.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to sufficiently demonstrate that these species will not suffer adverse effects. The development site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

There exists a fundamental contradiction within the application, as the developer concludes that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically only needed when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not

substantiated by the underlying evidence.

Moreover, the assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not fully recognised, and the reliance on modelling approaches introduces uncertainty, particularly for species in steep decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor introduces a considerable risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

The identified deficiencies also reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a lawful determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment represents a significant evidential gap that undermines the entire evaluation process for this development. While the developer engaged local residents through focus groups, the lack of transparency concerning the findings prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research. Existing summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and should not be dismissed as speculative; however, without access to the complete assessment, the findings cannot be properly scrutinised, limiting their significance in the decision-making process.

Furthermore, there is a perception among residents that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this critical insight, these impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, preventing a comprehensive understanding of its implications.

This lack of transparency also compromises the Environmental Impact Assessment process. An accurate assessment of social, economic, and health impacts is crucial for developments of this scale, especially when community character and functioning may be affected. Without the complete dataset, the application fails to provide a thorough evidential basis for evaluating the balance between benefits and harm. From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should support positive health outcomes and avoid harm; however, the available evidence suggests existing adverse effects that have not been fully disclosed. Consequently, compliance with this policy cannot be established in the absence of the full assessment.

The procedural implications of this situation are serious. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment regime is concerning. Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the evaluation incomplete and unreliable, hindering lawful determination and highlighting that the application is not backed by sufficient information.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in terms of sustainable development, as it fails to meet the requirements outlined by statutory duties and national policy. This application echoes the central issues associated with the earlier Lewis Wind Power proposal, which was rejected in 2008 due to its unacceptable level of industrialisation. Although it is now presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, these improvements do not resolve the fundamental problems.

A reliable evidential basis for this application is lacking. There are critical gaps in baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures is particularly troubling, as is the failure to consider essential impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete and does not adequately inform on likely significant effects or residual impacts.

In terms of procedural integrity, there are notable failures present. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the omission of a complete Social Impact Assessment is material, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

This proposal is also at odds with National Planning Framework 4. It does not demonstrate sufficient protection for biodiversity, natural environments, and cultural heritage. Additionally, it fails to provide acceptable evidence regarding health and wellbeing impacts, nor does it show a net economic benefit owing to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been assessed properly, thus obscuring potential impacts on peatlands, carbon balance, habitats, and crofting lands.

Uncertainty surrounds the environmental risks associated with this proposal. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been reached, necessitating the application of the precautionary principle and making it impossible to conclude that impacts are acceptable.

There are concerns regarding substantial and irreversible alterations to a highly sensitive landscape as a result of this proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption to cultural and visual relationships, along with impacts on tourism, will lead to permanent effects that cannot be adequately mitigated.

In summary, this application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs 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: 4F64D2E9

Member of the public 1502

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an assessment of the Environmental Impact Assessment Report and associated documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. Situated off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. The design, scale, and proximity of the wind farm proposal raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents missing critical environmental data, limited and inconsistent baseline information, and unclear aspects of the proposal. The flexible design framework inhibits a proper understanding of the likely significant effects, and the unspecified mitigation measures raise doubts about their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which lack robust supporting evidence.

There are evident and serious conflicts with policy. The proposal 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. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability from a policy perspective.

The scale of this proposal is unprecedented for the location, with large turbines planned in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and clarity to provide a reliable account of the likely environmental effects stemming from the proposal. The approach of using a flexible Project Design Envelope, without committing to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This undermines the integrity of the assessment and prevents a consistent worst-case scenario from being applied. As a result, the impacts described may not accurately represent what will ultimately be constructed, which impedes both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

The application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This implies that consent is being sought with the expectation that environmental harm will be addressed later, thereby obstructing any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation measures are clearly established prior to decision-making.

Moreover, there are notable evidential deficiencies, including inadequate baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This introduces uncertainty regarding the scale and significance of impacts, especially when 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, resulting in scientific uncertainty that does not comply with statutory obligations.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes mandates for biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that adequate safeguards are in place.

In conclusion, the combination of reliance on 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 deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives in the application is fundamentally insufficient and does not fulfil the legal requirements of the Environmental Impact Assessment process. Instead of offering a systematic and reasoned evaluation of viable alternatives based

on their environmental impacts, the submission provides a narrative description of how the project has developed. This method does not effectively demonstrate that less harmful options have been appropriately identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a lack of transparent and evidence-backed comparison concerning various offshore sites, development scales, or design configurations. The application notably fails to show that the developer has adequately considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be minimised. The sensitivity of the West Lewis coastline and the critical nature of proximity to the shore in assessing impact mean that the lack of such analysis hampers any conclusion regarding whether the proposed location is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient proof that alternative pathways have been thoroughly examined to prevent or lessen impacts on sensitive sites. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy to avoid these impacts and the lack of comparative analysis suggest that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not adequately prove that environmental harm has been reduced through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which impedes the competent authority's ability to ascertain whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it cannot be confirmed that the proposal is a sustainable or policy-compliant option.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is characterised by its high sensitivity and biological activity, yet the assessment of marine ecology and protected species is significantly lacking. It fails to deliver a comprehensive and dependable understanding of the ecological receptors within this marine system. The methodologies employed do not effectively capture vital details regarding species presence, behaviour, and habitat usage, leading to an assessment that lacks a strong evidential basis for evaluating potential impacts.

One major oversight is the treatment of otters, which are a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. The neglect of their core foraging range and

behavioural patterns means that the potential impacts of construction-related disturbances, including noise and increased activity, have not been properly evaluated. This shortcoming undermines any assertions concerning the absence of significant effects on this species.

Additionally, there are notable deficiencies in how basking sharks are assessed. The reliance on aerial surveys introduces significant detection bias, especially under Atlantic conditions, which likely leads to an underestimation of their presence in these waters. This contrasts with established land-based observations that indicate frequent usage of the area by these sharks. By not incorporating or adequately considering this data, the assessment presents an incomplete baseline, which further weakens the reliability of its conclusions.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The insufficient baseline data hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty about the true risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, consent cannot be granted lawfully.

In conclusion, the assessment's reliance on incomplete baseline data, flawed methodologies, and unfounded conclusions renders it unreliable. These deficiencies hinder a thorough evaluation of the impacts on marine ecology and protected species, leading to the overall determination that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the application exhibits significant deficiencies, marked by notable gaps in evidence and contradictions that diminish its credibility. It is essential to recognise that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. The development's location within critical foraging areas and migratory pathways further exacerbates the issue, as the assessment does not thoroughly analyse potential displacement, collision risks, or habitat loss.

A critical inconsistency within the application arises from the developer's assertion that there will be no significant adverse effects, coupled with the pursuit of a Habitats Regulations derogation case. Such a case is only necessitated when significant harm is

anticipated. This contradiction raises serious questions regarding the assessment's reliability, suggesting that the conclusions drawn are unsupported by the foundational evidence.

Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling techniques brings uncertainty, particularly concerning species in steep decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underreport mortality rates, particularly in the absence of complete baseline data and a full understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses substantial risks, essentially creating an obstruction in a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of ongoing mortality within this corridor or the potential ramifications for species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data inadequacies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thus precluding a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the conservation of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings inhibit a comprehensive evaluation of the impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a living cultural landscape, where the connections between environment, language, tradition, and community are integral. It adopts a reductive perspective, viewing heritage merely as isolated and static entities, rather than acknowledging their continuous social, cultural, and spiritual significance within the community.

A notable shortcoming is evident in the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, the assessment mischaracterises

them as static features, neglecting their ongoing use, meaning, and the implications of development on their context. This oversight leads to an incomplete understanding of the cultural ramifications and disregards their importance to community life.

Moreover, the assessment does not address intangible cultural heritage elements, such as the Gaelic language and traditions, nor does it acknowledge the longstanding relationship between the community and the coastal environment. These factors are vital to the area's identity but are completely omitted from the evaluation, representing a considerable lapse. The cultural impact of the development cannot be adequately comprehended without these considerations.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has a unique cultural identity, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018. Its absence means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, which alone obstructs lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly regarding the preservation of historic assets and sites. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy stipulations.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural effects of the development have not been sufficiently assessed, and the application lacks an adequate foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, resulting in a significant evidential gap that hinders the public and the competent authority from grasping the complete extent of social risks identified by the developer's research. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the lack of transparency around the full report obstructs proper scrutiny of its findings.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are thus grounded in reality, not speculation. However, the

inability to review the full assessment limits the capacity to evaluate the significance of these effects in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with indications of “cultural loss” highlighted in the developer’s own findings. Nevertheless, these adverse impacts have not been adequately integrated into the main application, which is a serious oversight. The non-disclosure of the comprehensive Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning are at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and potential harm, largely due to the absence of the full dataset.

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

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material gap in the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the combination of the withheld full Social Impact Assessment and evidence of existing negative impacts renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and underscores the inadequacy of information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines near the West Lewis coastline presents significant shortcomings in the assessment of seascape, landscape, and visual impacts. This coastline, characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness, would face fundamental alterations due to the introduction of an industrial presence in close proximity to the shoreline. Such a transformation is not only significant but also permanent and irreversible, fundamentally changing the landscape character.

The application inadequately portrays the extent of visual change, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and compromise the essential

qualities of naturalness and remoteness that define the area. The current assessment fails to capture the severity of this impact or its importance within the context of such a sensitive landscape.

Methodological issues are also evident in the selection and presentation of visual viewpoints. It appears that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises concerns that the assessment may have understated the magnitude of visual impacts, thereby questioning the reliability of the findings.

Moreover, the assessment does not consider the interconnected nature of landscape, seascape, and cultural heritage. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded within a broader landscape context that relies on visual and spatial links to the Atlantic horizon. By treating these assets as separate entities, the assessment overlooks their interdependence, leading to an incomplete analysis 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 results not only in a visual impact but also in broader cultural and spatial harm, which the application has not sufficiently evaluated.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of the proposed changes is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any claims of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. As such, the anticipated changes represent a fundamental and permanent alteration that cannot be lessened to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this unique 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 fails to provide the necessary detail for evaluating likely environmental effects. The application does not include fully developed

Construction Environmental Management Plans or Pollution Prevention Plans, relying instead on mitigation and contingency measures that will be prepared after consent. This approach hinders any meaningful assessment of their adequacy or effectiveness.

The West Lewis coastline, known for its clean coastal waters and sensitive habitats, is particularly vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these incidents will be prevented, controlled, or monitored. There is considerable uncertainty regarding the scale and behaviour of sediment plumes arising from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, which could affect marine species and habitats already identified as sensitive.

Moreover, the absence of detailed emergency response procedures exacerbates these issues. By deferring contingency planning until after consent, the application does not allow for the evaluation of whether appropriate safeguards exist to respond to pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards conflicts with the Environmental Impact Assessment regime requirements. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be made. Additionally, the application fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts render the assessment materially deficient. These deficiencies prevent a robust evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough evaluation of ecological and socio-economic impacts related to fisheries and marine life. Off the West Lewis coast, there exists both a diverse marine ecosystem and a functioning fishing industry. However, the proposal does not adequately demonstrate how these essential habitats and activities will be protected or maintained without significant disruption.

One of the critical flaws in the application is the assumption that fishing activity can be relocated without consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can support the additional pressure that would result from such displacement. This oversight is crucial, as it poses a risk of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Without a comprehensive and evidence-based assessment, the implications for fisheries and the livelihoods they support remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended duration is expected to create disturbances across significant distances, potentially impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects and fails to provide adequate supporting evidence.

In the application, there is an evident inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously describing potential impacts as negligible. This contradiction calls into question the validity of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

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

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

Overall, the absence of evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions present in the application render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning the onshore infrastructure is significantly incomplete and neglects to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines are closely interconnected with the onshore works, yet they are assessed in isolation, leading to a disjointed approach that conceals the true extent of environmental and socio-economic repercussions.

The onshore aspects of the project include cabling that crosses protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. Notably, this work involves excavation across deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Excluding or postponing the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the differentiation between offshore and onshore elements leads to a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks to delicate habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been undertaken, casting doubt on the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

The introduction of permanent red aviation lighting visible over long distances would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline. This

area is characterised by exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and tourism value. The application does not address the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The omission of such assessments is significant, particularly as dark skies are important for the area's identity and for emerging sectors such as astro-tourism.

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

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

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

TOURISM

The assessment of tourism impacts is critically inadequate, failing to analyse the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it neglects to provide any quantitative analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

The economic significance of tourism has been notable, with 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 does not address how the industrialisation of the seascape and deterioration of environmental quality might affect the Tourism Gross Value Added or the broader economic resilience. In the absence of this analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector.

The omission of a Dark Skies Assessment further exacerbates the issue, as it overlooks the critical role of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are integral to visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. This lack of consideration highlights a substantial gap

in understanding the impacts on a recognised and expanding segment of the local economy.

Given that the island community has limited economic diversification, the oversight in assessing tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The failure to conduct a compliant Island Communities Impact Assessment signifies 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 adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefit. It contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental influences on visitor behaviour, and acknowledge the economic dependency of the island culminates in a significant evidential void. This hinders a thorough evaluation of economic effects and supports the assertion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under an ostensibly stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still falls short.

There are significant gaps in the evidential basis for the application, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the proposed mitigation measures lack specification, and crucial impact pathways—including those affecting nocturnal wildlife, full onshore infrastructure, and tourism—have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

The procedural aspects of the application also exhibit clear deficiencies. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment represents a material omission, preventing the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience. These issues collectively render the application unsuitable for determination.

Moreover, the proposal directly conflicts with National Planning Framework 4, as it

does not sufficiently protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to the absence of tourism impact modelling. A proper assessment of the cumulative impact of both offshore and onshore elements is lacking, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold required to confidently exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to necessitate the submission of the missing information. A formal request is made for the outright refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

The planned installation is too close to the shore.
I fully support renewables but these need to be installed much further out in the ocean. I've read about the consistent low hum they generate which could have an effect on people's health.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2F733D22

Member of the public 1503

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 founded on an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. Situated off the west side of the Isle of Lewis, the location is characterised by its Atlantic-facing coastline, a nearly untouched environment, and a strong cultural identity. The scale, design, and proximity of the proposal raise crucial questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework used obscures a clear understanding of potential significant effects, while the proposed mitigation measures, which have not been detailed, render it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidence.

There are evident and significant conflicts with existing policies. The proposal shows inconsistency with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national standards for protecting biodiversity, climate interests, and environmental integrity can be achieved. These conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The scale of the proposed development is unprecedented for this area, featuring large turbines situated near the shoreline, which introduces substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents numerous deficiencies that undermine its reliability and completeness, preventing a lawful assessment of the environmental effects associated with the proposal. A significant issue arises from the use of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and inhibits a consistent application of a worst-case scenario, ultimately failing to provide both the public and the competent authority with a clear understanding of the potential environmental effects that may arise from the development.

Additionally, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. By seeking consent on the premise that environmental harm will be addressed later, it obstructs any meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

Moreover, the report suffers from significant evidential deficiencies. There are notable gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. Consequently, the absence of comprehensive information hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

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

In summary, the deficiencies stemming from an undefined design envelope, lack of specified mitigation, and inadequacies in baseline data lead to an unreliable Environmental Impact Assessment Report. These shortcomings prevent a robust and lawful assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species contains significant deficiencies that compromise its reliability and completeness, particularly concerning the West Lewis coastal environment. This marine system is known to be biologically active and sensitive, yet the data collected is incomplete, and the methodologies used

fall short in adequately capturing species presence, behaviour, and habitat usage. Consequently, the evaluation lacks a solid evidential basis for understanding potential impacts.

Among the critical oversights is the treatment of otters, a species protected under European law. The application does not sufficiently recognise or assess their active use of coastal regions for foraging and movement. Ignoring their core foraging range and behavioural patterns means that the implications of construction-related disturbances, noise, and increased activity remain inadequately evaluated. This oversight undermines any claims regarding the lack of significant impacts on this species.

Furthermore, the assessment of basking sharks demonstrates additional shortcomings. The reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic weather conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that highlight their frequent use of these waters. The failure to consider such data properly contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws indicate that conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The absence of sufficient baseline data hampers meaningful evaluations of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This introduces uncertainty about the actual risk levels faced by 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 adequately identified or assessed protected species. This uncertainty prevents the dismissal of adverse effects with reasonable scientific assurance, necessitating the application of the precautionary principle. Under these circumstances, it would not be lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant flaws, characterised by gaps in evidence and inconsistencies that call its conclusions into question. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in the development area, yet the assessment fails to rigorously evaluate

issues such as displacement, collision risk, or habitat loss.

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not adequately establish that seabirds associated with protected sites, like the Lewis Peatlands and St Kilda, will be unaffected. It inadequately accounts for the significance of these feeding grounds, and reliance on modelling approaches injects uncertainty, particularly concerning species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

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

From a regulatory viewpoint, the application fails to meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling weaknesses, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These inadequacies obstruct a thorough evaluation of potential impacts and contribute to the overall assertion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is characterised as a living cultural landscape, where the interplay of environment, language, tradition, and community is vital. However, the assessment of cultural heritage and community identity associated with this area is insufficient, as it treats heritage merely as a collection of isolated and static assets. This approach neglects the dynamic social, cultural, and spiritual roles that these elements play within the community.

Cemeteries located at Dalmore, Bragar, and Barvas are of particular significance, as they are active sites of burial and spiritual practice. The assessment, however, categorises these sites as static features and fails to account for their ongoing use and meaning, alongside the implications of development on their surrounding environments. This mischaracterisation leads to an incomplete understanding of cultural effects and overlooks the cemeteries' importance to community life.

Moreover, the evaluation does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the long-established relationship between the community and the coastal environment. Such elements are crucial to the area's identity, yet they are completely overlooked, resulting in a substantial omission that hinders a comprehensive understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as Indigenous People. Nonetheless, the process of Free, Prior and Informed Consent has not been implemented, which diminishes the legitimacy of the assessment and fails to adhere to established participatory principles for decisions affecting cultural and environmental matters.

A significant procedural shortcoming is evident in the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment restricts the competent authority's ability to meet its legal obligations regarding the evaluation of social, cultural, and economic impacts on the island community, thereby preventing lawful determination of the proposal.

From a policy standpoint, these oversights place the proposal in direct contradiction with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, constitutes a clear deviation from requisite policy standards.

Overall, the combined 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 remain unexamined, and the application fails to offer a solid foundation for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal presents significant challenges regarding the assessment of social impacts, health, and wellbeing, which are materially deficient and lack the necessary transparency for lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the complete

range of social risks highlighted by the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern associated with the scale and proximity of the proposed development. These impacts stem from direct engagement and are not mere speculation. The failure to disclose the full assessment limits the capacity for thorough scrutiny of the findings and restricts the evaluation of their significance within the overall decision-making process.

Moreover, there is clear evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” cited among the developer’s findings. However, these impacts have not been sufficiently integrated into the main application nor afforded the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, particularly when they may disrupt community character and function. By failing to provide the complete dataset, the application falls short of establishing a thorough evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. The development is required to promote positive health outcomes and mitigate harm; however, the evidence at hand reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, the application cannot claim compliance with this crucial policy.

The procedural implications of these omissions are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and fails to meet the evidential requirements stipulated by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly flawed, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, a lack of development, and a strong feeling of remoteness. The addition of large-scale turbines near the shore would establish a persistent and overwhelming industrial presence,

fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

Moreover, the application does not sufficiently depict the scale of the visual changes anticipated. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence suggests that the viewpoints selected may overlook the most sensitive receptors or fail to address worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an underestimation of visual impact, calling into question the credibility of the assessment.

Another significant oversight is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting that visually and spatially relates to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating them as isolated assets, which leads to an incomplete understanding of the impacts on their setting and cultural importance.

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

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

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

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the intertwined 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 landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess construction and pollution risks adequately. It involves significant seabed preparation and installation in the challenging conditions of the Atlantic, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, making it impossible to meaningfully evaluate their effectiveness.

This lack of clearly defined future measures is alarming, especially considering the delicate nature of the West Lewis coastline, which features clean coastal waters and sensitive habitats at risk from sediment disturbance and pollution. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical spills, it fails to detail how these issues will be managed or mitigated.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from the proposed activities. Without thorough modelling and well-defined management strategies, it is not feasible to ascertain the extent or ecological implications of these disturbances, including their effects on marine species and habitats that are known to be vulnerable.

The situation is exacerbated by the absence of detailed emergency response procedures. Deferring essential contingency planning to after consent restricts the ability to evaluate whether appropriate measures are in place for addressing pollution incidents, increasing procedural risk and hindering the competent authority's ability to enforce environmental safeguards at the determination stage.

From a regulatory standpoint, the postponement of crucial environmental protections contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be reviewed before granting consent, and when vital information is absent, a lawful decision cannot be reached. The application also does not demonstrate adherence to policies regarding environmental protection and water quality.

Overall, the lack of defined mitigation strategies, inadequate management plans, and uncertainty surrounding potential environmental impacts collectively render the assessment severely deficient. These issues hinder a thorough evaluation of construction and pollution risks and further confirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application under review fails to adequately protect or maintain these critical habitats and uses, leading to significant concerns regarding ecological and socio-economic impacts. The assessment of fisheries and marine life is lacking, particularly in its evaluation of fishing displacement, which is presumed to occur without consequence. There is no evidence presented that alternative fishing grounds are accessible or can sustain additional pressure, a

significant oversight that raises the risk of overfishing and potential economic fallout for the local fleet.

Moreover, the proposal poses considerable risks to marine species, especially due to underwater noise from construction activities. The high-energy hammer piling anticipated over an extended duration is likely to disturb marine life across vast distances, impacting species such as dolphins. Concerns have been raised about the predicted disturbance affecting a substantial part of the local bottlenose dolphin population, yet the application downplays the significance of these effects without adequate supporting evidence.

The application also reveals contradictions, acknowledging the necessity for licences for any harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where potential harm is identified that may warrant legal authorisation.

Cumulative impacts resulting from habitat disturbance, noise, and the displacement of fishing activities have not been sufficiently evaluated. The lack of a comprehensive assessment of these combined effects leaves the overall implications for marine ecosystems and socio-economic conditions unclear.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, precluding any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies compromise the reliability of the assessment, thereby obstructing a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed assessment of onshore infrastructure is fundamentally incomplete and neglects the comprehensive impacts associated with what is fundamentally one integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately, leading to a fragmented understanding that obscures the overall environmental and socio-economic repercussions.

Included within the onshore components are the cabling that will traverse protected moorland, the construction of a substation in the vicinity of Stornoway, and the associated access infrastructure that cuts through sensitive landscapes. These activities necessitate excavation in areas of deep peat, especially within Barvas Moor, an important carbon sink and ecologically significant habitat. The application lacks a

thorough assessment of these impacts, inhibiting a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of onshore impact assessments hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered in unison, yet the disaggregation of offshore and onshore components means that the total impacts on peatlands, habitats, and local communities remain poorly understood.

There are notable risks to vulnerable habitats, including machair systems and peatland environments, which are protected under existing policy. The application falls short of demonstrating that impacts on these sensitive areas have been fully assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or show that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application fails to provide evidence that necessary consents or processes have been undertaken, leading to doubts about the project's feasibility and legal compliance.

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

In summary, the division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application deficient and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. The proposed development includes permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive "wall of light" effect across the western horizon, 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 residents and visitors. This is particularly concerning

given the importance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to consider these potential impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, the assessment neglects to consider the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The application lacks any lighting impact assessment or phototaxis study, thus failing to evaluate how aviation lighting may affect these species or increase their mortality rates.

The reliance on daytime survey data within the ornithological assessment further compounds this oversight, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting; however, this potential risk 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 a proper assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, these omissions are inconsistent with National Planning Framework 4 concerning the protection of natural places and the maintenance of environmental quality. Additionally, the lack of assessment undermines the broader evaluation of landscape and seascape impacts, as the night-time character is integral to the environment.

In conclusion, the lack of evaluation regarding dark skies and nocturnal wildlife constitutes a serious evidential shortcoming. The deficiency in baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a profound failure to comply with the principles of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application revisits core issues that previously led to the refusal of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. Notably, it is now presented within a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential basis necessary for determination. The application fails to present complete baseline data and continues to rely on an

undefined design envelope. Furthermore, it depends on unspecified mitigation measures and neglects significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the entire Social Impact Assessment is a material omission. These flaws obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. It 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. The cumulative effects of both offshore and onshore components have not been properly evaluated, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to mandate the submission of the 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: 0E97C0C7

Member of the public 1504

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The 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 rich cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are significant gaps in critical environmental data, with baseline information being both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The use of a flexible design framework complicates the assessment of likely significant effects, and reliance on unspecified mitigation measures raises doubts about their effectiveness. Consequently, the provided documentation does not facilitate a comprehensive understanding of potential environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not substantiated by robust evidence.

There are notable policy conflicts that further complicate the application. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability from a policy perspective.

The unprecedented scale of the proposal, featuring large turbines situated close to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information, dependence on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and lacks a comprehensive, transparent, and dependable evaluation of the potential environmental consequences of the proposal. The introduction of a flexible Project

Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach compromises the integrity of the assessment, meaning that the impacts described may not accurately reflect the final development, thus hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

Moreover, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans that have yet to be established. Consequently, consent is sought on the premise that environmental damage will be rectified later, obstructing any substantial evaluation of efficacy or assessment of remaining impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigations are clearly outlined prior to any decision-making.

Additionally, there are serious evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This generates uncertainty regarding the magnitude and significance of impacts, particularly when negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory requirements.

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

In summary, the reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies inhibit a lawful and robust appraisal of environmental effects, leaving the competent authority incapable of making an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. This inadequacy undermines the assessment's ability to furnish a solid evidential basis for evaluating potential impacts.

A critical gap exists concerning otters, classified as a European Protected Species, as the application does not sufficiently recognise or assess their use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means the potential impacts of construction-related disturbances, noise, and increased activity have not been thoroughly evaluated. This limitation casts doubt on any conclusions suggesting there would be no significant effects on this species.

Furthermore, there are significant deficiencies in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate a frequent use of these waters. The failure to adequately incorporate or consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

Due to these methodological shortcomings, the assertions of negligible or non-significant effects rely on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions leads to an assessment that lacks reliability. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the overarching determination that the application fails to provide a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant shortcoming of the assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve

as active sites for burial and spiritual practices, yet they are categorised as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to an incomplete evaluation of the cultural effects and disregarding their importance in community life.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline would lead to a continuous industrial presence, fundamentally changing the area's character defined by its open Atlantic horizon and undeveloped nature. This alteration would result in a permanent transformation of the landscape, which has not been adequately assessed in terms of visual impacts.

The application fails to represent the magnitude of the visual change. The close proximity and scale of the turbines would dominate views from residential areas,

historic sites, and popular coastal locations, impacting visual amenity and diminishing the naturalness and sense of remoteness in this sensitive landscape. The assessment does not convey the level of this impact or its significance adequately.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that some viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an understatement of the visual impacts, calling the reliability of the assessment into question.

Another deficiency is the lack of evaluation regarding 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 that visually and spatially relates to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these sites as isolated, resulting in an incomplete evaluation of the impact on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The anticipated changes are incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further undermines claims of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The reliance on undefined future measures raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. The proposal entails substantial seabed preparation and installation works within 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 would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

The assessment of construction and pollution risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. The application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills but does not supply sufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures compounds these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the point of determination. From a regulatory perspective, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed prior to consent, and in the absence of this information, a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts render the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, further supporting 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 reliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the proposal does not adequately demonstrate that these vital habitats can be preserved without considerable disruption.

One major concern is the unsubstantiated assumption that fishing activity can be displaced without adverse effects. There is no evidence provided to indicate that alternative fishing grounds exist, are accessible, or are capable of accommodating increased pressure from displaced fishing efforts. This oversight is critical, as the potential for overfishing in other areas poses economic risks for the local fishing fleet. The absence of a thorough, evidence-based assessment means that the implications

for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances, impacting species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially in instances where harm is expected to a degree that 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 comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, despite being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal remains flawed.

The evidential basis for the application is neither complete nor reliable. Key baseline data is missing, the design envelope is not clearly defined, and unspecified mitigation measures are relied upon. Additionally, essential impact pathways have been

overlooked, including those related to nocturnal wildlife, onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, the application presents serious shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately protect biodiversity, natural places, or cultural heritage. It fails to show 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 both offshore and onshore components have not been thoroughly assessed, leaving the impacts on peatlands, carbon balance, habitats, and crofting land unclear.

Uncertainty surrounds potential environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal threatens to cause substantial and irreversible changes to a sensitive landscape. Industrialisation along the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and negative impacts on tourism create permanent effects that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information gaps, coupled with policy contradictions and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or use appropriate regulatory measures to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E4C53F32

Member of the public 1505

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 characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The application raises significant concerns due to its scale, proximity to the shoreline, and design, which challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A thorough review of the Environmental Impact Assessment Report and supporting documentation reveals that the application does not provide an adequate evidential basis for a lawful determination. There are critical gaps in environmental data, and the baseline information is both limited and inconsistent. Moreover, many key aspects of the proposal remain undefined. The flexible design framework employed by the developers hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents a proper assessment of their effectiveness. Consequently, the documentation does not offer a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial policy conflicts inherent in the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, introduces serious concerns about landscape capacity, visual dominance, and overall environmental impact. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is apparent that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental

effects associated with the proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the consistent application of a worst-case scenario. This compromises the assessment's integrity, meaning that the impacts outlined may not accurately represent the development that will eventually be constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought with the assumption that environmental harm will be managed at a later date. This prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. The deferral of crucial information to stages post-consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be thoroughly established before determination.

There exist significant evidential shortcomings, such as gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These deficiencies lead to uncertainty regarding the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential standards set forth in the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, thereby preventing the competent authority from making an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a crucial requirement of the Environmental Impact Assessment regime. Instead of presenting a reasoned comparison of realistic alternatives that considers their environmental effects, it merely offers a narrative of the project's development. This approach does not adequately demonstrate that less harmful

options have been effectively identified and evaluated in favour of more damaging solutions.

The absence of a transparent comparison of alternative offshore locations, scales of development, or design configurations is particularly concerning. The application does not show that the developer has meaningfully considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. The West Lewis coastline is sensitive, and proximity to the shore significantly influences the overall impact. Without such analysis, it is impossible to conclude that the chosen siting is the least damaging option.

Deficiencies are also apparent in the assessment of cable routing and landfall, with insufficient evidence presented to support the exploration of alternative routes that could avoid or minimise impacts on sensitive receptors, including culturally significant sites like Barvas Cemetery. The lack of a clear strategy to avoid harm, coupled with inadequate comparative analysis, suggests a failure to apply mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine whether more appropriate and less harmful alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or complies with policy requirements.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and the wellbeing of communities. The omission of a structured, comparative assessment is a significant shortfall that contributes to the overall conclusion that the application has not been sufficiently evaluated, thus precluding lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a complete and dependable understanding of ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data provided is incomplete, and the methodologies employed inadequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not establish a solid evidential basis for evaluating impacts.

A significant oversight involves otters, a European Protected Species, where the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The lack of evaluation regarding 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

undermines any conclusions drawn about the absence of significant effects on this species.

Additional shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders meaningful evaluation of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This generates uncertainty concerning the actual scale 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 protected species have not been correctly identified or assessed. The uncertainty introduced prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies preclude 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 ornithological assessment presents significant flaws, characterised by gaps in evidence and inconsistencies that call its conclusions into question. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in the development area, yet the assessment fails to rigorously evaluate issues such as displacement, collision risk, or habitat loss.

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not adequately establish that seabirds associated with protected sites, like the Lewis Peatlands and St Kilda, will be unaffected. It inadequately accounts for the significance of these feeding grounds, and reliance on modelling approaches injects uncertainty, particularly concerning species experiencing severe decline, such

as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

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

From a regulatory viewpoint, the application fails to meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling weaknesses, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These inadequacies obstruct a thorough evaluation of potential impacts and contribute to the overall assertion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is 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 publication of the full Social Impact Assessment commissioned by the developer represents a significant evidential gap. This omission prevents both the public and the competent authority from fully understanding the social risks identified through the developer's own research, hindering proper scrutiny of the findings. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are derived from direct engagement, not speculation, yet the withholding of the full assessment limits the ability to determine their significance within the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately integrated into the main application or given the appropriate weight. The non-disclosure of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency further undermines the Environmental Impact Assessment

process. A comprehensive understanding of the social, economic, and health impacts is essential for developments of this scale, especially when community character and functioning may be affected. Without the full dataset, the application fails to provide a complete evidential basis for assessing the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and avoids harm. However, the available evidence indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and underscores the conclusion that the application lacks sufficient information for proper consideration.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is significantly lacking and does not adequately capture the scale of change or the sensitivity of the environment. The character of the West Lewis coastline is defined by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The proposed large-scale turbines, located near the shoreline, would introduce a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to properly represent the extent of this visual change. The turbines' size and proximity would dominate views from residential areas, historic sites, and popular coastal locations. This domination would directly 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.

There are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially in relation to key cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been understated, which diminishes the reliability of the assessment.

Another significant deficiency is the lack of consideration of 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, visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation rather than recognising 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, changing how heritage assets are experienced and severing their connection to the natural horizon. This represents not just a visual impact but also broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The magnitude of change is at odds with the requirement to protect landscape character, visual amenity, and the setting 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 scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than something that can be adequately reduced through mitigation.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings impede a reliable evaluation and strengthen 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 significantly lacking and does not include the necessary details to adequately evaluate potential environmental impacts. There is a proposed undertaking of substantial seabed preparation and installation work in a high-energy Atlantic environment; however, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be established after consent has been granted, which hampers any meaningful assessment of their potential effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the environment it affects. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to sediment disruption and pollution. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not supply adequate information on how these risks will be prevented, managed, or monitored.

Moreover, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust

modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential repercussions for marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant likely effects and mitigation measures must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements regarding 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, further reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application fails to provide a comprehensive assessment of fisheries and marine life, resulting in an inadequate evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not demonstrate how these vital uses and habitats can be adequately protected or maintained without causing significant disruption.

One critical concern is the flawed assumption that fishing activities can be displaced without consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressures from such displacement. This significant oversight raises the risk of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and livelihoods remain unclear.

Additionally, 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 an extended duration is likely to create disturbances over large distances, adversely affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application

downplays these effects, lacking adequate supporting evidence.

There are notable inconsistencies within the application itself; it acknowledges the necessity of licenses to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

Moreover, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be adequately assessed.

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

In conclusion, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application culminate in an incomplete and unreliable assessment. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally flawed and fails to acknowledge the comprehensive impacts stemming from a single integrated project. The offshore turbines and onshore works are interconnected yet are evaluated separately, leading to a disjointed approach that clouds the real environmental and socio-economic consequences.

The onshore components involve cabling traversing protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through delicate landscapes. These undertakings require excavation across areas of deep peat, especially within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive area. The application lacks a thorough assessment of these effects, hindering a full comprehension of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements be reviewed together; however, the disconnection of offshore and onshore components results in a failure to grasp the combined impacts on peatlands, habitats, and local communities.

Moreover, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application does not provide evidence that the impacts on these habitats have been sufficiently assessed or that suitable avoidance measures have been enacted, leaving a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy initiatives. The application inadequately addresses this concern and does not demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land may introduce conflicts with existing land use and legal rights. The application fails to offer evidence that the necessary consents or procedures have been initiated, casting doubt on its deliverability and lawful execution.

From a policy standpoint, the failure to evaluate the project as a cohesive whole and to demonstrate the protection of peatlands, habitats, and land use interests contravenes the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment omits the assessment of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline features exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect that would fundamentally change the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This lack of assessment is critical given the importance 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 clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no evaluation of how the proposed lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and an increased risk of collisions. The application does not include any lighting impact assessment or phototaxis study, leaving unassessed the potential effects of aviation lighting on these species and the risk of

increased mortality.

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

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and hinders 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 detracts from the overall assessment of landscape and seascape impacts, as the character of night-time forms an essential component of the environment.

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

TOURISM

The assessment regarding the impacts on tourism is significantly lacking and does not adequately evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly unspoiled landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantifiable assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not model the effects that the industrialisation of the seascape and the degradation of environmental quality would have on Tourism Gross Value Added or broader economic resilience. In the absence of such an analysis, it remains unclear whether the development would generate a net economic benefit or detract from an already established and expanding sector.

Moreover, the assessment neglects to account for the critical role that environmental quality plays in tourism, including the significance of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a substantial gap in the understanding of the impacts on a

recognised and growing segment of the local economy.

Considering the context of an island community with limited economic diversification, the failure to 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 scrutinised as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency lead to a significant evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application recalls the issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level 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 application does not adequately address these concerns.

There are significant gaps in the evidence provided, with a reliance on an undefined design envelope and unspecified mitigation measures. Key impact pathways, particularly concerning nocturnal wildlife, the entirety of the onshore infrastructure, and tourism effects, have been omitted. This incomplete Environmental Impact Assessment fails to provide a comprehensive understanding of likely significant effects or any residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of a full Social Impact Assessment is a critical oversight. Such omissions hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts National Planning Framework 4 by not demonstrating protection for biodiversity and cultural heritage. It also fails to show that health and wellbeing impacts are acceptable and lacks evidence for a net economic

benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, clouding understanding of effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties around environmental risks are potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The required evidential threshold 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.

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

Overall, the application is unfit for determination both procedurally and substantively. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority must refuse consent for this application or utilise relevant regulatory provisions to require the submission of the necessary missing information.

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

Additional Comments

I object to the construction of this windfarm, as it is not clear that the public will benefit, this private company producing electricity for the national grid, Firstly Scotland domestically is already self-sufficient in renewable energy. Profits from this project go to private shareholders, not the local community or national coffers.
There is a climate emergency that is understood, but the amount of peat that will dug up to lay cables, there has not been a proper impact assessment of how much carbon will be released in that process and how the potential restoration capacity of the surrounding peat will be disturbed by laying cables there. Peat restoration along with maintaining natural forest are the two most carbon efficient capture processes that we have globally, you are potentially knocking one of those out, peat disturbance and future further restoration by laying cables for a windfarm of the proposed size. Not to mention the road construction also.

Renewable energy also must be assessed alongside - have the maximum amount of measures been taking to reduce electrical consumption before destroying a land and marine environment of outstanding natural beauty and of ecological importance. That has not been done across the UK. The waters of the outer Hebrides are recognised through out the world for their pristine and productive nature, which is ever more important given the destruction that many seas beds and marine ecosystems and

species have suffered in northern European seas.

It is very clear that the local community do not want this and that 'consultation' before planning was approved was minimal to say the least.

There is no real environmental and health and wellbeing impact assessment that has been done, as globally this is still an emerging area of research so it cannot be claimed yet that the full impacts are known to date.

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: 1FCEBDF4

Member of the public 1506

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact.

A review of the Environmental Impact Assessment Report and supporting documentation reveals material planning, environmental, cultural, and procedural deficiencies. The application fails to provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The use of a flexible design framework hinders a clear understanding of likely significant effects. Moreover, reliance on unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

development, thereby preventing both the public and the competent authority from fully grasping the true environmental implications.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application inadequately addresses the assessment of alternatives, failing to meet the requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental impacts, it offers merely a narrative of project evolution. This method does not prove that less harmful options have been properly identified or assessed in preference to more damaging solutions.

The lack of a transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations is evident. Particularly, there is no indication that the developer has genuinely considered placing turbines further

offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The West Lewis coastline's sensitivity and the critical role that proximity to shore plays in determining impact highlight the shortcomings of this analysis. Consequently, one cannot conclude that the proposed siting represents the least damaging option.

These shortcomings also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been properly explored to avoid or reduce impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been employed, leading to a reliance on post-design mitigation measures instead.

As a result, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from assessing whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies jeopardise compliance with National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. This inadequacy undermines the assessment's ability to furnish a solid evidential basis for evaluating potential impacts.

A critical gap exists concerning otters, classified as a European Protected Species, as the application does not sufficiently recognise or assess their use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means the potential impacts of construction-related disturbances, noise, and increased activity have not been thoroughly evaluated. This limitation casts doubt on any conclusions suggesting there would be no significant effects on this species.

Furthermore, there are significant deficiencies in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of

basking sharks, especially when compared to established land-based observations that indicate a frequent use of these waters. The failure to adequately incorporate or consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

Due to these methodological shortcomings, the assertions of negligible or non-significant effects rely on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions leads to an assessment that lacks reliability. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the overarching determination that the application fails to provide a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant gaps in evidence and internal inconsistencies, rendering its conclusions unreliable. 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 necessary evidential standards to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located near the proposed development, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only warranted 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 evidence provided. The assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been thoroughly considered, and the reliance on modelling approaches adds uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully

understood.

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

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been reached. This 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 demonstrate that internationally important seabird populations will not be adversely affected puts the proposal directly at odds with national policy.

In summary, the assessment is fundamentally flawed due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies hinder 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 evaluation of cultural heritage and community identity is severely lacking, as it fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts a simplistic viewpoint, perceiving heritage merely as a collection of static, isolated assets without recognising their ongoing social, cultural, and spiritual relevance within the community.

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped, remote character. The introduction of large-scale turbines near the shoreline would create a continuous and dominant 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, failing to adequately represent the magnitude of this visual change. The proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the naturalness and sense of remoteness that defines this area.

There are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valued landscapes. This raises the risk that the visual impact has been understated, thereby undermining the reliability of the assessment. Additionally, the assessment neglects 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 connected to the

Atlantic horizon, but the assessment treats them as isolated assets, failing to acknowledge their interdependence and resulting in an incomplete evaluation of impacts on their cultural significance and setting.

The industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been adequately assessed in the application. From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

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, rather than something that can 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, which prevents a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not provide a robust evaluation of the ecological or socio-economic impacts associated with the proposed development. This deficiency raises serious concerns regarding the ability to protect and maintain these vital uses and habitats without significant disruption.

A critical flaw in the application is the assumption that fishing activity can be displaced without negative consequences. There is no evidence presented to show that alternative fishing grounds are available or able to support additional pressure, making this omission particularly significant. The potential for displacement risks overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to disturb marine life over large distances, notably affecting species such as dolphins. Despite the serious implications for a significant portion of the local bottlenose dolphin population, the application minimizes these effects without adequate supporting evidence.

There exists an inconsistency within the application, acknowledging the necessity for

licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This contradiction casts doubt on the credibility of the assessment and raises compliance concerns with the Habitats Regulations, especially where potential harm is anticipated to a degree requiring legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and 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 adequately illustrate that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies undermine the assessment's reliability. These shortcomings prevent a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The onshore infrastructure comprises various elements, including cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access routes through delicate landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which is recognised as both an ecologically sensitive habitat and a critical carbon store. The application does not offer a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

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

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

terms of biodiversity protection.

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

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

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

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

TOURISM

The application does not adequately evaluate the potential impacts on tourism, which is a crucial sector for the Isle of Lewis economy. Tourism has significantly expanded, with revenues increasing from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, making up to 16% of the island’s economy. However, the assessment neglects to model how the proposed large-scale offshore infrastructure could alter visitor numbers, behaviour, or overall economic contributions. Without this analysis, it is impossible to ascertain whether the development would generate a net economic benefit or jeopardise a vital and expanding sector.

Furthermore, the assessment overlooks the critical role of environmental quality in supporting tourism. The appeal of the area’s wild coastline, unspoiled landscapes, dark skies, and sense of remoteness are central to the visitor experience. The omission of a Dark Skies Assessment exacerbates the issue, resulting in a considerable gap in understanding the impacts on growing segments of the local economy, such as nature-based tourism and astro-tourism.

The implications of these oversights extend beyond tourism alone. In an island community with limited economic diversification, failing to assess tourism impacts poses broader risks for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that the vulnerabilities facing the economy have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4, especially regarding economic impact and the need to show net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and does not furnish sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

There are significant gaps in the evidential basis necessary for a sound determination of the application. The use of an undefined design envelope is problematic, and there is a lack of specified mitigation measures. Furthermore, the application omits critical impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

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

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The absence of tourism impact modelling fails to provide evidence of any net economic benefit. Moreover, there has been insufficient assessment of the cumulative impact from both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. This lack of thorough

investigation, and instances of internal inconsistency, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, thereby hindering the capacity to lawfully conclude that impacts are acceptable.

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

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

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

Additional Comments

I object to the proposed wind farm on the west coast of the Isle of Lewis due to its significant environmental, cultural, and social impacts. The Environmental Impact Assessment is inadequate and fails to address cumulative effects or fully consider less harmful alternatives. The development would damage the area's cultural heritage and community identity, harm residents' wellbeing, and significantly alter the unspoilt coastal landscape. It also poses risks to fisheries and marine ecosystems, and could negatively impact tourism, which depends on the island's natural beauty. Overall, the proposal would cause disproportionate and irreversible harm to a sensitive and valued environment.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A33D85F9

Member of the public 1507

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and its accompanying documents has revealed significant deficiencies in material planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly pristine environment, and rich cultural identity. There are fundamental concerns about the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and the principles of sustainable development.

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

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

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline poses a significant threat, as this would create a continuous industrial presence that fundamentally alters the unique character of this landscape. Such a transformation would be permanent and irreversible, fundamentally changing the views and experiences of the area.

Concerns arise regarding the assessment of visual impacts, which fails to accurately reflect the scale of the changes anticipated. The turbines' size and proximity would dominate views from residential areas, historic sites, and popular coastal locations, severely impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of these impacts in a sensitive landscape, leading to an inadequate understanding of the transformation that would occur.

Methodological issues are apparent in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not encompass the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the magnitude of visual impact has been understated, which undermines the credibility of the assessment.

Moreover, there is a notable failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape that connects visually and spatially to the Atlantic horizon. The assessment treats these sites in isolation, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their ties to the natural horizon. This issue extends beyond mere visual impacts, encompassing a wider cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a comprehensive worst-case assessment diminishes any claims of policy compliance.

Ultimately, the identified impacts cannot be effectively mitigated. Given the turbines' size, height, and proximity, their presence would be both dominant and unavoidable. The resulting alterations would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

In summary, the assessment falls short in accurately representing the scale of the impact, the sensitivity of the environment, and the interrelated nature of landscape and

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life presented in this application is inadequate and fails to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem alongside a vital fishing industry, yet the application does not convincingly demonstrate that these uses and habitats can be preserved without causing considerable disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is no supporting evidence that alternative fishing grounds are not only available but also accessible and capable of absorbing additional pressure. This critical gap poses a risk of overfishing in other areas, which could lead to detrimental economic consequences for the local fishing fleet. In the absence of a clear, evidence-based assessment, the effects on fisheries and the livelihoods they support remain unclear.

Moreover, the proposal brings with it considerable risks to marine species, particularly due to the underwater noise associated with construction. The use of high-energy hammer piling over an extended period is likely to create disturbances over large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises urgent concerns, yet these effects are minimised in the application without sufficient supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious issues regarding compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively

render the assessment incomplete and unreliable. These deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

TOURISM

The application presents a significant evidential gap regarding the assessment of tourism impacts, which is crucial for understanding the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives on the region's wild coastline, near-pristine landscapes, dark skies, and the prevailing sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from a well-established and expanding sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to visitor experiences. This oversight extends to the failure to include a Dark Skies Assessment, creating a substantial void in understanding the implications for an acknowledged and developing aspect of the local economy, such as nature-based tourism and astro-tourism.

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

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a substantial evidential shortfall. This deficiency obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the standards of sustainable development as required by statutory duties and national policy. It mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to address these critical areas adequately.

A major concern is the lack of a complete and reliable evidential basis for the application. There are significant gaps in baseline data, an undefined design envelope is still in use, and there is a heavy reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural failures are evident in the application as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Furthermore, the proposal contradicts the National Planning Framework 4, lacking evidence for the protection of biodiversity, natural areas, and cultural heritage. It does not demonstrate that the impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact assessments. The cumulative impacts of both offshore and onshore components have not been appropriately evaluated, leading to a lack of clarity regarding the 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, at times, inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion regarding the acceptability of the impacts.

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

In summary, the application presents both procedural and substantive deficiencies that render it unfit for determination. The extent of the informational gaps, coupled with

conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

I think this development is an error in judgement of what is appropriate. Once done it sets poor precedent for others around our coasts and impacts across many issues, including archaeological setting impacts and sense of place, community wellbeing and mental health, identity and culture plus environmental issues galore. This shouldn't be permitted.

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: 74818913

Member of the public 1508

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, viewing heritage merely as a series of isolated, static

assets, without recognising 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 locations serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to acknowledge the impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards the vital role these sites play in community life.

Furthermore, the application overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, representing a significant omission. Without factoring in these aspects, the cultural impact of the development cannot be understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristic of Indigenous Peoples, yet no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy standpoint, the deficiencies outlined place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the recognition of living cultural practices, signifies a clear departure from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient basis for evaluating the true cultural cost of the proposal.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life lacks depth and fails to provide a solid 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 adequately demonstrate how these vital uses and habitats can be preserved or maintained without considerable disruption.

A critical concern is the assumption that fishing activities can simply be relocated without repercussions. The application does not present evidence showing that alternative fishing grounds are viable, accessible, or able to support the additional strain. This significant omission raises alarms, as the displacement of fishing could lead to overfishing in other areas, potentially harming the local fishing fleet's economic stability. Without a thorough and evidence-based evaluation, the repercussions on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses substantial threats to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is likely to cause disturbances across vast distances, impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects without adequate substantiation.

The application exhibits a clear inconsistency by acknowledging the necessity for licences to authorise harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal approval.

Additionally, the assessment neglects to consider cumulative impacts that arise from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. Absent a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant oversight. The coastline of West Lewis is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red

aviation lighting, which would be visible over extensive distances and create a continuous “wall of light” effect across the western horizon, thus fundamentally changing the night-time environment.

Furthermore, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly notable given the significance of dark skies to the local identity and the growth of tourism sectors such as astro-tourism. The lack of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental assessment.

Additionally, there is no investigation into the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to evaluate how aviation lighting may affect these species or exacerbate mortality rates.

This gap is exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would experience adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is unmet, thus invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

In summary, the failure to conduct an assessment of dark skies and nocturnal wildlife constitutes a major evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient to support a lawful determination.

TOURISM

The assessment of tourism impacts is notably inadequate, lacking a thorough evaluation of the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area’s wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. Although the application acknowledges

that 86% of visitors are attracted by the scenery, it does not provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the total economic contribution.

Significant growth in tourism has been observed, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this crucial analysis, it remains unclear whether the development would yield a net economic benefit or adversely affect a well-established and expanding sector.

Furthermore, the assessment does not acknowledge the critical role that environmental quality plays in tourism, such as the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

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

From a policy perspective, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity of proving net benefit. Additionally, it contradicts strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the lack of quantification of tourism impacts, failure to evaluate environmental factors influencing visitor behaviour, and disregard for the economic dependency of the island culminate in a significant evidential gap. This hinders a comprehensive assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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 the impacts on tourism represent permanent changes that cannot be mitigated adequately.

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, along with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or invoke the necessary regulatory measures to mandate the submission of the missing information.

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

Additional Comments

The natural environment is Scotland's most important selling point - both for visitors and for local people. There are others places more suitable for 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: 7D145CFF