Member of the public 1509

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 sufficient transparency and reliability in conveying the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the integrity of the assessment, leading to potential discrepancies between the projected impacts and the actual development, thereby hindering both public understanding and the competent authority's ability to gauge the full extent of environmental effects.

Furthermore, the application is predominantly contingent on mitigation measures, monitoring strategies, and management plans that are not yet established. As a result, consent is requested based on the expectation that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of these measures' effectiveness or a comprehensive assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly defined before determination.

There are notable evidential shortcomings, such as gaps in baseline data, limitations in methodology, and the reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a thorough understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

Consequently, the application does not meet the evidential standards stipulated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes directives related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been comprehensively assessed or that suitable safeguards are in place.

In conclusion, the dependency on an undefined design envelope, the lack of specified mitigation measures, and the inadequacies in baseline data all contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental impacts, leaving the competent authority ill-equipped to make a determination based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposal under consideration lacks a comprehensive assessment of marine ecology and protected species, which is essential for understanding the ecological receptors within the West Lewis coastal environment. This region is recognised as a

highly sensitive and biologically active marine system. However, the data available is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of various species. Consequently, the assessment does not provide a reliable evidential basis for evaluating potential impacts.

Notably, the assessment fails to properly identify and assess otters, which are a European Protected Species. There is insufficient recognition of their active use of coastal areas for foraging and movement, and the core foraging range and behavioural patterns of otters have not been adequately considered. This lack of detail means that the potential impacts of construction disturbance, noise, and increased activity on otters have not been thoroughly assessed, undermining any conclusions about the absence of significant effects on this species.

Additionally, there are substantial deficiencies in the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and weakens the reliability of the conclusions drawn.

The methodological limitations present mean that conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks posed 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 there has been a failure to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the conclusion that adverse effects can be excluded beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

In summary, the assessment is rendered unreliable due to the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies obstruct 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 application fails to demonstrate that internationally important seabird populations will not be adversely affected, which places the proposal in direct conflict with national policy. Significant gaps in evidence and internal inconsistencies undermine the

conclusions of the ornithological assessment, which is materially flawed. The west coast of the Isle of Lewis, known for its internationally significant seabird populations, faces potential threats as many species are already in decline. Furthermore, the development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction arises in the application, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessitated when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the underlying evidence. The evaluation fails to sufficiently address the potential impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds has not been fully accounted for, and reliance on modelling introduces uncertainty, particularly for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

The siting of turbines within a recognised migratory corridor creates an additional risk by effectively forming a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. From a regulatory perspective, the evidential threshold required to determine no adverse effect on the integrity of protected sites has not been met. 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 achieved. This invokes the precautionary principle and impedes a lawful conclusion in support of consent.

Overall, the deficiencies identified reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. Taken collectively, the shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately preventing a robust evaluation of impacts and indicating that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

Additionally, there is a critical procedural failure due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement established under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders the determination of the proposal unlawful.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts contains significant deficiencies and fails to appropriately convey the extent of change and the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its unspoilt Atlantic horizon and a pronounced sense of remoteness. The proposal to introduce large-scale turbines near the shoreline would establish a persistent industrial presence, thereby fundamentally transforming this character and

effecting a permanent and irreversible alteration to the landscape.

Concerns arise from the inadequacy of the application in representing the scale of visual change. The proximity and size of the proposed turbines would dominate views from residential areas, historical sites, and frequently visited coastal spots, negatively impacting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the magnitude of this impact or its significance within such a sensitive landscape.

Methodological issues related to the selection and presentation of visual viewpoints must also be addressed. Evidence indicates that the viewpoints chosen may not fully capture the most sensitive receptors or portray worst-case scenarios, particularly concerning vital cultural heritage sites and high-value landscapes. This omission raises concerns that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Moreover, the assessment fails to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context, linked visually and spatially to the Atlantic horizon. The evaluation treats these sites as standalone assets, neglecting their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This change represents not just a visual concern but a more profound cultural and spatial detriment that has not been sufficiently examined within the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The scale of change introduced is inconsistent with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further detracts from any assertion of policy compliance.

Additionally, the identified impacts are such that they cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. Consequently, the nature of the transformation is profound and permanent, rather than something that could be mitigated to an acceptable level.

Overall, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks does not provide adequate detail for evaluating likely environmental effects. This proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application relies on future mitigation and contingency measures that will be prepared after consent, which obstructs any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer sufficient details on prevention, control, or monitoring measures.

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

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application inhibits the assessment of whether suitable safeguards are established to address pollution incidents. This situation introduces procedural risk and diminishes the ability of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before granting consent; the absence of such information precludes a lawful determination. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further corroborate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which appears insufficient and lacks a comprehensive evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast host a diverse marine ecosystem alongside an active fishing industry. However, the

application fails to adequately demonstrate how these habitats and uses can be protected or maintained without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without repercussions. There is no evidence provided that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This notable omission is consequential, as such displacement threatens to exacerbate overfishing in other areas and could lead to broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal presents considerable risks to marine species, notably through underwater noise produced during construction activities. The use of high-energy hammer piling over extended periods is likely to create disturbances that affect marine life over large distances, with particular concern for species like dolphins. The projected disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application appears to downplay the importance of these effects, lacking adequate supporting evidence.

The application exhibits a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

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

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

TOURISM

The application does not adequately address the tourism impacts that are crucial to the economy of the Isle of Lewis. With tourism reliant on the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness, the application's

acknowledgment that 86% of visitors are attracted by scenery is insufficient. There is no quantified assessment of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the application fails to model the potential impact of industrialising the seascape and degrading environmental quality on Tourism Gross Value Added and the broader economic resilience of the island. Without this analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or hinder a vital and expanding sector.

The environmental quality that underpins tourism is not sufficiently considered, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experience, as well as for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on a growing segment of the local economy.

For an island community with limited economic diversification, the neglect to assess the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, as required by the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the requirement for net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates significant failures in meeting the criteria for sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. Notably, the application mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable scale of industrialisation. While the current proposal is submitted under a more robust policy framework emphasising biodiversity, peatland protection, landscape integrity, and community wellbeing, it nonetheless falls short.

There are substantial shortcomings in the evidential basis provided for this application. It lacks complete baseline data and relies on a design envelope that remains undefined. Furthermore, the proposal does not specify the mitigation measures that would be applied and omits essential impact pathways, including those affecting nocturnal wildlife, the entirety of onshore infrastructure, and the implications for tourism. As a result, the Environmental Impact Assessment is incomplete, inhibiting a comprehensive understanding of the likely significant effects and residual impacts.

In addition to these evidential gaps, there are notable procedural deficiencies. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations under the Islands (Scotland) Act 2018. Moreover, the failure to present a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal also contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is a lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore components have not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainty surrounding environmental risks is another critical issue. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, 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 negative impacts on tourism represent permanent effects that cannot be mitigated to an acceptable degree.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined 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.

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: F29EA76F

Member of the public 1510

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its associated documents reveals significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine conditions, and strong cultural heritage. The nature, scale, and proximity of the proposed development raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is evident that crucial environmental data is absent, baseline information is both limited and inconsistent, and several vital aspects of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by reliable evidence.

There are distinct and significant policy inconsistencies present. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and jeopardise the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the project is concerning, with large turbines positioned in close proximity to the shore, leading to significant worries about landscape capacity, visual impact, and environmental effects. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrate that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents serious deficiencies, lacking a thorough, transparent, and reliable evaluation of the anticipated 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 significant uncertainty. This absence of fixed parameters hampers the consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. Consequently, the reported impacts may not accurately reflect the actual development that could be constructed, leaving both the public and the competent authority unable to grasp the true extent of potential environmental effects.

Furthermore, the application depends extensively on mitigation measures, monitoring strategies, and management plans that remain undefined. This reliance leads to consent being sought on the premise that environmental harm will be addressed subsequently, which hinders any meaningful evaluation of their effectiveness or the assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and runs contrary to the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly articulated before any determination.

Additionally, notable evidential gaps exist, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This situation creates uncertainty regarding both the scale and significance of the impacts, especially in instances where negligible or non-significant effects are concluded without substantial supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

As a result, the application fails to satisfy the evidential threshold set forth by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that appropriate safeguards are established.

In conclusion, the combination of an undefined design envelope, lack of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These issues prevent a lawful and robust assessment of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, which does not fulfil the requirements of the Environmental Impact Assessment regime. Instead of offering a reasoned and structured comparison of viable alternatives based on their environmental effects, it provides a narrative of project development that does not

convincingly show that less harmful options have been identified, assessed, and chosen over more damaging ones.

There is a notable absence of a transparent, evidence-based evaluation of different offshore locations, scales of development, and design configurations. Specifically, the application fails to illustrate that the developer has genuinely considered positioning the turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitive nature of the West Lewis coastline and the critical role that proximity to shore plays in determining impacts, the lack of such analysis means that no conclusion can be drawn about whether the proposed siting is the least damaging option.

This inadequacy also applies to the assessment of cable routing and landfall. There is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate that the design process did not incorporate mitigation by design, instead relying heavily on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout planning, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is a sustainable or policy-compliant option.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a critical omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant oversight in this application pertains to otters, which are designated as a European Protected Species. There has been inadequate recognition and assessment

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. The development site is situated in key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already experiencing decline. However, the application fails to convincingly demonstrate that these species will not be adversely affected. It does not adequately evaluate the risks associated with displacement, collision, or habitat loss for these birds.

There exists a fundamental contradiction within the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is

anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the presented conclusions lack support from the underlying evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. It does not fully consider the importance of their feeding grounds, and the reliance on modelling approaches adds a layer of uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used appear likely to underestimate mortality, especially where baseline data is inadequate and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor introduces additional significant risks, creating a barrier within a primary flight path utilized by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential effects on species that have relatively small global populations.

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

Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings obstruct a robust evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the proposed development is significantly lacking in transparency and is inadequate for a lawful evaluation. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been published. This omission creates a substantial evidential gap that hinders both public understanding and the ability of the competent authority to grasp the full range of social risks uncovered by the developer's own research.

Summaries made available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and therefore are not mere speculation. However, the lack of disclosure regarding the full assessment limits

proper scrutiny of the findings, ultimately restricting the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” identified in the developer’s findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor afforded the necessary consideration. The failure to release the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. Understanding the social, economic, and health implications is crucial for developments of this magnitude, particularly when they may disrupt community character and functioning. The application, in withholding the full dataset, fails to provide a comprehensive evidential foundation for balancing the proposed benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments should contribute to positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain inadequately disclosed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application that fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Overall, the decision to withhold the full Social Impact Assessment, coupled with evidence of current negative impacts, results in an incomplete and unreliable evaluation. This lack of information precludes a lawful determination and underscores the conclusion that the application is not backed by sufficient data.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment, but the assessment of construction and pollution risks is lacking in detail needed for a thorough evaluation of likely environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application, which instead relies on the preparation of mitigation and contingency measures after consent. This reliance on undefined future actions raises serious concerns, particularly considering the sensitivity of the West Lewis coastline, which is home to clean coastal waters and vulnerable habitats at risk of sediment disturbance and contamination.

The application does acknowledge certain risks, such as sediment mobilisation and the

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application fails to adequately evaluate the ecological and socio-economic impacts, raising significant concerns regarding the protection and maintenance of these vital uses and habitats. The assessment lacks a comprehensive analysis of how these activities can coexist without substantial disruption.

A critical concern is the assumption that fishing activities can be displaced without adverse consequences. The application does not provide evidence that alternative fishing grounds are available or suitable for supporting the additional pressure that displacement would create. This lack of evidence is troubling, as it could lead to overfishing in other areas, resulting in wider economic repercussions for the local fishing fleet. Consequently, the impacts on fisheries and livelihoods remain poorly understood due to the absence of a clear, evidence-based assessment.

Furthermore, the proposal poses considerable risks to marine species, particularly due

to underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbances across considerable distances, which may affect species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population is a serious concern, yet the application inadequately addresses these impacts, lacking sufficient supporting evidence.

The assessment reveals a contradiction in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Moreover, the assessment does not adequately consider cumulative impacts arising from multiple factors, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, thus preventing a conclusion that the proposal embodies sustainable development.

In summary, the deficiencies in the evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies within the application collectively 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 application fails to provide a comprehensive assessment of the onshore infrastructure associated with the project, which is critical given the intrinsic connection between the offshore turbines and the onshore works. This fragmented approach obscures the true scale of the environmental and socio-economic impacts that arise from what is fundamentally a single integrated project. Significant onshore elements, such as cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes, have not been adequately evaluated. This includes excavation in areas of deep peat, particularly within Barvas Moor, an ecologically sensitive habitat and a crucial carbon store.

By not addressing the onshore impacts fully, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the separation of offshore and onshore elements means that the combined effects on

peatlands, habitats, and local communities remain unclear. There are substantial risks to sensitive habitats, including machair systems and peatland environments, which are subject to existing policy protections. The proposal does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been adopted, thus highlighting a significant evidential gap regarding biodiversity protection.

Concerns also arise related to the carbon balance due to the disturbance of peatland, which releases stored carbon and may create a carbon debt that contradicts the goals of renewable energy development. The application does not adequately tackle this issue or confirm that the overall carbon balance is indeed beneficial. Moreover, the routing of infrastructure through active croft land poses potential conflicts with current land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, which raises serious questions about the deliverability and lawful execution of the project.

From a policy standpoint, the inability to assess the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The failure to show that adverse impacts can be avoided or mitigated further weakens the application. Collectively, these issues, including the disjointed assessment of project components and the lack of thorough evaluation of environmental and land use impacts, render this segment of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect, changing the night-time environment.

The application fails to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the significance of dark skies to the area’s identity and the growth of tourism sectors like astro-tourism. The lack of consideration for these effects indicates a deficiency in the overall environmental assessment.

Moreover, the application does not address the potential impacts on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel may experience disorientation and increased collision risks due to artificial lighting. There is no lighting impact assessment or phototaxis study included, meaning the effects of aviation lighting on these species and potential mortality risks remain unassessed.

The reliance on daytime survey data in the ornithological assessment is also problematic, as it overlooks nocturnal activities and associated risks. Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has not been examined. The lack of night-time data creates a significant gap in understanding ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to determine if protected species or designated sites would be adversely impacted. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and hinders lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Additionally, it detracts from a comprehensive evaluation of landscape and seascape impacts, as the character of night-time is a crucial aspect of the environment.

In summary, the absence of any assessment related to dark skies and nocturnal wildlife creates a notable evidential gap. The missing baseline data, impact modelling, and species-specific analysis make the application insufficient and unable to support a lawful determination.

TOURISM

The Isle of Lewis is heavily reliant on tourism, a sector that has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs. This accounts for up to 16% of the island's economy. However, the current assessment of tourism impacts presented in the application is significantly lacking. It fails to evaluate the economic and social consequences for this vital sector, which is fundamentally reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment neglects to consider the role of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies in enhancing the visitor experience. This oversight is particularly concerning in light of emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment adds to this shortcoming, resulting in a considerable gap in understanding how these factors could impact a recognised and growing part of the local economy.

Given the limited economic diversification of the island community, the failure to assess tourism impacts poses 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 by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly regarding economic impact and the necessary evidence of net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers that influence visitor behaviour, and account for the island's economic dependency creates a significant evidential gap. This deficiency inhibits a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its attempt to meet the requirements for sustainable development, as it does not align with statutory obligations, national policy, or evidential standards. This application revisits the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to provide a reliable and comprehensive evidential basis for evaluation.

Key deficiencies in the application include significant gaps in baseline data, the use of an undefined design envelope, unspecified reliance on mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

Additionally, the application suffers from procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment represents a material omission. Such deficiencies prevent the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal is incompatible with National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not provide assurance that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and significant environmental risks persist, particularly concerning marine ecology, seabirds, protected species, and marine mammals. The assessments provided are incomplete and occasionally inconsistent, failing to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, which prohibits a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to obtain 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

Dear Sir/Madam,

I am writing to formally object to the proposed N4 offshore wind development off the Western Isles on environmental, ecological, socio-economic, and legal grounds.

Under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended), any project likely to have a significant effect on a European site must undergo Appropriate Assessment. Given the internationally important Special Areas of Conservation and Special Protection Areas in the Outer Hebrides, there is clear potential for significant adverse effects. Current scientific evidence highlights displacement, barrier effects, and collision risks for seabirds such as kittiwake (Rissa tridactyla) and gannet (Morus bassanus), alongside well-documented uncertainties in collision modelling and cumulative impact assessment. In line with established case law (Waddenzee C-127/02), consent cannot be granted where reasonable scientific doubt remains.

Construction-related underwater noise from pile driving presents a further significant risk to marine mammals, including harbour porpoise (Phocoena phocoena) and minke whale (Balaenoptera acutorostrata). Even with mitigation measures, residual impacts such as behavioural displacement and potential hearing damage remain a concern in these ecologically sensitive waters.

Seabed disturbance associated with turbine foundations and cable installation risks damaging slow-growing habitats such as maerl beds and may release stored carbon

from marine sediments. This “blue carbon” loss is not consistently accounted for in project carbon balance calculations and could materially affect the claimed net environmental benefit.

The proposal must also be considered alongside associated grid infrastructure. Any segmentation of offshore and onshore elements risks non-compliance with the Environmental Impact Assessment Directive (2011/92/EU, as amended), which requires cumulative assessment of all related development.

There are also material socio-economic concerns, including potential displacement of fishing activity and impacts on tourism, both of which are vital to the local economy. Scottish Planning Policy requires that development supports sustainable communities, and it is not clear that this proposal meets that standard.

Overall, the proposal is characterised by significant scientific uncertainty, particularly regarding cumulative and long-term ecological effects. The precautionary principle requires that, in such circumstances, decision-making errs on the side of environmental protection.

For these reasons, I do not believe it is possible to conclude beyond reasonable scientific doubt that the development will not adversely affect site integrity or wider environmental interests. I therefore respectfully request that consent is refused unless and until these concerns are comprehensively addressed.

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: 2D917D7B

Member of the public 1511

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 contains substantial deficiencies and does not deliver a comprehensive, clear, or dependable account of the potential environmental effects stemming from the proposal. A critical issue arises from the employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, ultimately undermining the assessment's integrity. Consequently, the impacts detailed may not accurately reflect the development ultimately built, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed at a later stage, which hinders any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and at odds with the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigations be clearly established before determination.

Additionally, there are notable evidential shortcomings, including 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, particularly in instances where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not fulfil the evidential threshold needed under 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 fails to demonstrate compliance with National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards exist.

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

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and evidence-based comparison of realistic alternatives based on their environmental impacts, it provides a narrative that details

the project's evolution. This narrative approach does not adequately demonstrate that less harmful options have been effectively identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a lack of transparent comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the assessment does not indicate that the developer has properly considered the option of placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis raises serious questions about whether the proposed siting truly represents the least damaging option available.

The inadequacies also extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes areas of significant cultural and spiritual value, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been adequately considered, with an undue reliance on post-design mitigation measures instead.

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

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant oversight that supports the conclusion that the application has not undergone sufficient evaluation and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to adequately assess marine ecology and protected species in the West Lewis coastal environment, which is a biologically active and sensitive marine system. The deficiencies in baseline data and methodologies applied result in an unreliable understanding of ecological receptors. A significant oversight involves the European Protected Species, otters, whose use of coastal areas for foraging and movement has not been properly recognised. Without consideration of their core foraging range and behavioural patterns, potential impacts from construction disturbances, noise, and increased activity have not been adequately evaluated, undermining conclusions about significant effects on this species.

Further issues arise in the assessment of basking sharks, where reliance on aerial

surveys creates a risk of detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence, particularly when compared to established land-based observations that show frequent use of these waters. The omission of this data leads to an incomplete baseline and further diminishes the reliability of the assessment's conclusions.

These methodological shortcomings indicate that the conclusions drawn regarding negligible or non-significant effects are based on assumptions rather than solid evidence. Moreover, insufficient baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces considerable uncertainty about the real risks facing marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or evaluated. The level of uncertainty introduced obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, which necessitates the application of the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the assessment's reliability is compromised by incomplete baseline data, flawed methodologies, and unfounded conclusions. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, culminating in the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is marred by significant methodological weaknesses and internal inconsistencies, resulting in an unreliable evaluation of impacts. Notably, the application does not adequately demonstrate that internationally important seabird populations, many of which are already in decline, will remain unaffected by the proposed development. The west coast of the Isle of Lewis is a critical habitat for these species, yet the assessment fails to provide sufficient evidence that their foraging areas and migratory pathways will be preserved.

Moreover, a fundamental contradiction is evident within the application. While the developer asserts that there will be no significant adverse effects, they simultaneously advance a Habitats Regulations derogation case, which is only required in scenarios where significant harm is anticipated. This inconsistency raises serious doubts about the validity of the conclusions drawn in the assessment, indicating that they are not substantiated by the underlying evidence.

The assessment also does not adequately address the importance of key feeding grounds associated with protected sites such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces substantial uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, and there is a likelihood that mortality rates are underestimated. This concern is exacerbated by incomplete baseline data

and a lack of understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor adds another layer of risk, creating a potential barrier to primary flight paths used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality within this corridor, particularly for species with small global populations, have not been adequately assessed.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to ascertain 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, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which hampers a lawful conclusion in favour of granting consent.

Furthermore, the identified deficiencies reflect a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places this proposal in direct opposition to national policy. Collectively, these factors culminate in the conclusion that the assessment does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is concerning and indicates a material deficiency that undermines lawful evaluation. Although the developer commissioned a Social Impact Assessment, which included focus groups with local residents, the full report remains unpublished. This gap in evidence significantly hinders both public understanding and the competent authority's ability to assess the social risks identified through the developer's research.

Summaries that are available reveal that residents are already dealing with measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. However, the absence of the full assessment obstructs proper scrutiny of these findings, limiting the capacity to fully appreciate their significance in the decision-making process.

Moreover, there is evidence to suggest that the proposal poses a threat to community identity and cohesion, with "cultural loss" explicitly noted in the developer's findings. Regrettably, these impacts have not been properly integrated into the main application or given the appropriate consideration they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency also impacts the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this nature, especially where community character and functioning are at risk. The omission of the full dataset renders the application inadequate for presenting a thorough evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not convincingly demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and mitigate harm, yet the evidence at hand indicates adverse effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, alongside the documented evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application proposes the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. This proposal would create a continuous and dominant industrial presence that fundamentally alters the existing character, leading to a permanent and irreversible transformation of the landscape. The assessment provided does not adequately represent the scale of this visual change, which would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and diminish the defining qualities of naturalness and remoteness, yet the assessment fails to convey the true level of impact or its significance within such a sensitive landscape.

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

Moreover, the assessment does not properly consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape,

visually and spatially linked to the Atlantic horizon. Treating these heritage assets as isolated entities fails to acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which these heritage assets are experienced and disrupting their connection to the natural horizon. This represents a broader cultural and spatial harm that remains inadequately assessed in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. However, the assessment of construction and pollution risks related to the proposal is incomplete, lacking the necessary detail to evaluate the likely environmental effects. The project entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet fully developed Construction Environmental Management Plans or Pollution Prevention Plans are absent. The application relies instead on mitigation and contingency measures that would be prepared post-consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, especially given the sensitivity of the receiving environment. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide adequate detail on how these risks will be prevented, controlled, or monitored. Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological impacts of these disturbances.

The absence of detailed emergency response procedures compounds these issues. By

postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether sufficient safeguards are in place to manage potential pollution events. This introduces procedural risk and limits the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted, and without this crucial information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its assessment of fisheries and marine life, which is inadequate and fails to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be preserved without causing considerable disruption.

One major issue is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to show that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This gap is particularly critical, as such displacement could lead to overfishing in other areas and create broader economic repercussions for the local fishing fleet. Without a detailed and evidence-based assessment, the ramifications for fisheries and livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, notably through the underwater noise produced during construction. The use of high-energy hammer piling over a prolonged period is expected to disturb marine life across extensive areas, particularly affecting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is a serious concern that the application tends to minimise, lacking adequate supporting evidence.

There exists a notable inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises serious questions about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not adequately 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, it is impossible 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 or the National Marine Plan. It does not adequately illustrate how the development can coexist with existing marine users or how it avoids unacceptable impacts on marine biodiversity, which hinders any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application does not adequately address concerns regarding carbon balance. Disturbance of peatland releases stored carbon, which could lead to a carbon debt that contradicts the principles of renewable energy development. There is insufficient information to confirm that the overall carbon balance remains beneficial, creating a significant oversight.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented to indicate that the necessary consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

The assessment of onshore infrastructure is materially incomplete and does not fully consider the impacts arising from what is essentially a single integrated project. While the offshore turbines and onshore works are intrinsically linked, they are assessed separately, leading to a fragmented approach that conceals the true scale of environmental and socio-economic effects.

Onshore elements encompass cabling across protected moorland, construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation across areas of deep peat, especially within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts impedes a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application inhibits a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together. The current

separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that these impacts have been thoroughly assessed or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap in biodiversity protection.

From a policy perspective, the lack of an integrated assessment of the project and the failure to demonstrate the protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the integrity of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances. This creates a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value.

There is a significant absence of assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This gap is particularly notable given the growing importance of dark skies to local identity and emerging sectors such as astro-tourism. The Environmental Impact Assessment does not evaluate how the proposed lighting may affect these crucial aspects.

Equally concerning is the lack of evaluation regarding impacts on nocturnal wildlife. Several species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not provide a lighting impact assessment or phototaxis study, meaning it fails to consider how the proposed aviation lighting could affect these species or contribute to increased mortality.

Moreover, the reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and related risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation due to artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding potential ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It undermines the overall evaluation of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

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

TOURISM

The application fails to adequately assess the impacts on tourism, which is a vital sector for the Isle of Lewis economy. The area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are essential draws for visitors. Notably, 86% of tourists are attracted by the scenery. However, there is no quantified analysis of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Tourism has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. Despite this significant contribution, the application does not explore how the potential industrialisation of the seascape and loss of environmental quality might affect the Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is unclear whether the proposed development would offer a net economic benefit or pose a threat to an already established and thriving sector.

Moreover, the role of environmental quality, including the value of unspoiled landscapes and dark skies to the visitor experience, is overlooked. This oversight is particularly concerning given the rise of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates the deficiencies in the application, resulting in a lack of understanding regarding the effects on this recognised and expanding segment of the local economy.

In a community with limited economic diversification, neglecting to assess tourism impacts has far-reaching consequences for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, which is a requirement 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 obligation to show net benefit. It also conflicts with strategic objectives that recognise tourism as a priority growth sector, failing to provide sufficient evidence for the competent authority to accurately assess the economic consequences of the proposal.

Ultimately, the lack of quantification of tourism impacts, the failure to consider environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency create a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the principles of sustainable development as defined by statutory duties and national policy. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was a central concern. Now, despite a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and community welfare, the application falls short.

There are substantial gaps in the evidential basis necessary for a thorough determination. Baseline data is incomplete, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways have been omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, hindering a complete understanding of potential significant effects or residual impacts.

Moreover, procedural failures are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal directly contradicts the principles set forth in National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to missing tourism impact assessments. Additionally, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The

necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B4F611A1

Member of the public 1512

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural heritage. Concerns arise from the scale, design, and proximity of the proposal, questioning its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful assessment. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, many key elements of the proposal remain undefined. This flexible design framework hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

There are evident and serious policy conflicts inherent in this proposal. 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 habitats, cultural heritage, and the well-being of communities. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and undermine the competent authority's capacity to conclude that the development meets policy standards.

Moreover, the unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to deliver a complete, transparent, or trustworthy account of the probable environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without clear commitments to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that will ultimately be constructed, which inhibits both the public and the competent authority from fully grasping the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed at a later stage hampers any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation measures are clearly established before determination.

In addition, significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs 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 does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including aspects related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

When considered collectively, the dependence 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 hinder a lawful and rigorous assessment of environmental effects and mean that the competent authority cannot make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a severely deficient assessment of marine ecology and protected species, failing to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly

sensitive and biologically active, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming involves otters, classified as a European Protected Species. The application inadequately addresses their active foraging and movement within coastal areas. This neglect of their core foraging range and behavioural patterns raises concerns about the potential effects of construction disturbance, noise, and increased activity, which have not been sufficiently evaluated. Such oversights undermine any assertions regarding the lack of significant effects on this species.

The evaluation of basking sharks also reveals significant deficiencies, particularly due to an over-reliance on aerial surveys that introduce notable detection bias, especially under Atlantic conditions. This methodology likely underestimates the sharks' presence, especially when compared to established land-based observations that indicate these waters are frequently used by them. The failure to properly consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data prevents a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risks posed to marine species and habitats.

Regulatory scrutiny reveals that the application does not satisfy the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. The failure to properly identify or assess protected species introduces a level of uncertainty that precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In such circumstances, the law does not permit consent to be granted.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development does not adequately assess the cultural heritage and identity of the community, particularly along the West Lewis coastline, which is a vibrant cultural landscape where language, tradition, community, and environment are deeply intertwined. The application takes an overly simplistic view of heritage, treating it as a collection of isolated assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

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

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

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

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

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

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

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and a profound sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, there is no quantified

assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contributions.

The significance of tourism has risen considerably, with its value increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added and broader economic resilience. Without this analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and burgeoning sector.

Furthermore, the assessment fails to recognise the importance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, creating a substantial gap in understanding the implications for a recognised and expanding segment of the local economy.

In an island community characterised by limited economic diversification, the lack of consideration for tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed as mandated by the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify tourism impacts, analyse environmental factors influencing visitor behaviour, and consider the island's economic reliance culminates in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when examined against statutory duties, national policy, and evidential standards. This application reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Presenting the proposal under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not address these persistent concerns.

The evidential basis for determining the application is neither complete nor reliable.

Significant gaps exist in baseline data, there is an undefined design envelope, mitigation measures remain unspecified, and crucial impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, precluding a comprehensive understanding of likely significant effects or residual impacts.

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

The proposal is in direct contradiction to National Planning Framework 4. It fails to demonstrate the protection of biodiversity, natural spaces, and cultural heritage; it does not show that health and wellbeing impacts are acceptable; and it cannot substantiate a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impact of both offshore and onshore components has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, internally inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

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

When all factors are considered, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, paired with conflicts in policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent based on these grounds or invoke the necessary regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 00B65307

Member of the public 1513

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 within the frameworks of marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report alongside supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Located off the west side of the Isle of Lewis, an area characterised by its Atlantic coastline, relatively unspoilt environment, and rich cultural heritage, the proposed development's scale, design, and proximity raise serious questions about its alignment with statutory obligations, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined aspects of the proposal. The flexible design framework used does not allow for a clear comprehension of the potential significant effects, while the unspecified mitigation measures hinder the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, with claims of negligible effects lacking robust support.

Moreover, there are evident and significant conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests required for consent and compromise the competent authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of this proposal, featuring large turbines situated near the shoreline, raises major concerns about the capacity of the landscape, visual impact, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential gaps, and clear policy inconsistencies illustrate that the application is incomplete and does not support a lawful determination. In light of these factors, it is essential that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not offer a comprehensive or dependable account of the potential environmental effects associated with the proposal. The application's reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces significant uncertainty. This ambiguity undermines the assessment's integrity and may lead to a misrepresentation of the actual impacts of the development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

Furthermore, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent under the assumption that environmental harm will be resolved later obstructs meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly delineated before any determination is made.

Additionally, the report exhibits serious evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of the impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information hampers a thorough understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, as it does not eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, including standards related to biodiversity protection and environmental integrity, since it cannot prove that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns regarding the adequacy of the alternatives assessment, which fails to meet the requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on environmental consequences, the application merely

recounts the evolution of the project. This method does not adequately demonstrate that less damaging options have been properly evaluated and chosen over more harmful solutions.

Moreover, there is a lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely contemplated positioning turbines further offshore, where visual, ecological, and coastal impacts would probably be diminished. Considering the delicate nature of the West Lewis coastline and the critical role of proximity to shore in assessing impacts, the failure to perform such an analysis prevents any conclusion that the proposed location is the least damaging option.

These shortcomings are also evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been explored thoroughly to reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation through design has not been properly considered, relying instead on measures to mitigate impacts after the design has been established.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hampering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be claimed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines alignment with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly inadequate, failing to provide a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet the methodologies used lack the ability to fully capture species presence, behaviours, and habitat usage, leading to an incomplete baseline data set. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, the assessment neglects to adequately identify and evaluate otters, which are classified as a European Protected Species. The application does not recognise their

active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to a significant oversight in assessing the potential effects of construction-related disturbances, noise, and increased activity. This omission undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the evaluation of basking sharks is problematic, as it relies heavily on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in comparison to established land-based observations that indicate their frequent use of these waters. The failure to integrate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions reached.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent cannot be justified under the law.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment related to the ornithological impacts is fundamentally flawed, marked by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application does not satisfactorily demonstrate, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Located within key foraging areas and migratory pathways, the development raises concerns that are not adequately addressed, particularly regarding displacement, collision risk, and habitat loss.

A critical inconsistency arises in the application, where the developer asserts there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and suggests that its

conclusions lack support from the underlying evidence. The evaluation does not sufficiently demonstrate that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully taken into account, and the reliance on modelling approaches introduces uncertainty, especially concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and an incomplete understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses an extra significant risk, effectively acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor, as well as the potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application falls short of the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data deficiencies and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent. The identified deficiencies also indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is deeply flawed, particularly in its treatment of the West Lewis coastline, which should be recognised as a living cultural landscape where environment, language, tradition, and community are interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a reductive view, treating heritage as a collection of isolated and static assets.

A critical issue arises from 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, yet they are categorised in the assessment as static features. This mischaracterisation neglects their continued use and significance, as well as the impact that development would have on their surroundings. Consequently, the evaluation of cultural effects remains incomplete and ignores their integral role in community life.

Intangible cultural heritage has also been overlooked in the application, with essential elements such as the Gaelic language, community traditions, and the longstanding relationship between the local population and the coastal environment excluded from consideration. These aspects are vital to the area's identity, and their absence from the assessment constitutes a major shortcoming. Without addressing these elements, the cultural impact of the proposed development cannot be fully understood.

Further issues pertain to community rights and engagement. The Gaelic-speaking community possesses a distinct cultural identity that aligns with the characteristics of an Indigenous People, 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 concerning participation in decisions that affect cultural and environmental interests.

The absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, as required by the Islands (Scotland) Act 2018. The competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community in the absence of this assessment, which alone inhibits a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly in its obligations to protect historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices signals a clear deviation from policy requirements.

Overall, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application lacking a solid basis for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which involved focus groups with local residents, has not been published in full, creating a significant evidential gap. This lack of transparency hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research. Summaries indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and should not be regarded as speculative; however, the failure to disclose the complete assessment restricts proper scrutiny and limits the evaluation of their significance in the decision-making process.

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

acknowledgment, these impacts have not been adequately integrated into the main application or given due consideration. The withholding of the complete Social Impact Assessment obfuscates the true human and social costs associated with the development.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it is impossible to verify compliance with this policy.

The procedural ramifications are considerable. 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 obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is insufficient and does not adequately capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed large-scale turbines would impose a continuous and overwhelming industrial presence near the shoreline, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

The application fails to represent the extent of this visual change properly. The size and closeness of the turbines mean that they would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly affect visual amenity and diminish the important qualities of naturalness and remoteness. The assessment does not adequately convey the impact level or its significance within such a sensitive landscape.

There are also issues with the methodology used for selecting and presenting visual

viewpoints. Evidence indicates that the viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been underestimated, compromising the reliability of the assessment.

Another shortcoming is the lack of assessment of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment regards these as separate entities instead of acknowledging their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and interfering with their connection to the natural horizon. This represents not only a visual effect but also a wider cultural and spatial detriment that has not been adequately considered in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment presented regarding construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. The project entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be formulated after consent is granted, thereby hindering any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns due to the sensitivity of the affected environment. The West Lewis coastline is home to clean

coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

There is also ambiguity concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly outlined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is applicable to potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

Moreover, the deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the ability to evaluate whether adequate safeguards are established to respond to pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation measures must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in an assessment that is materially deficient. These issues obstruct a comprehensive evaluation of construction and pollution risks and further reinforce the assertion 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, yet the application under review presents an inadequate assessment of fisheries and marine life. It does not deliver a robust evaluation of either ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without consequences. The application lacks evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle additional pressure. This oversight is critical as it poses risks of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal raises considerable risks for marine species due to underwater noise generated during construction activities. The high-energy hammer

piling anticipated over an extended duration is likely to cause disturbances across large distances, significantly affecting species such as dolphins. The application suggests a likely disturbance to a considerable portion of the local bottlenose dolphin population, yet this is downplayed without adequate supporting evidence, which raises serious concerns.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is recognised, while impacts are concurrently described as negligible. This contradiction undermines the credibility of the assessment and calls into question compliance with the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

Additionally, the assessment fails to account for cumulative impacts stemming from multiple pressures, including 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 demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which precludes any conclusion that the proposal embodies sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

The proposal introduces permanent red aviation lighting, which would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment and is not assessed for its impact on visual amenity, landscape character, or the

experiences of residents and visitors. Given the West Lewis coastline's exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value, this omission is substantial.

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

From a policy standpoint, the lack of assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment. Collectively, the failure to consider dark skies and nocturnal wildlife creates a considerable evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts presented in the application is significantly lacking, 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. Despite the application acknowledging that 86% of visitors are attracted by the scenery, it does not provide a quantitative evaluation of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contribution.

Tourism has experienced considerable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island’s economy. However, the application neglects to model the potential impacts of seascape industrialisation and environmental quality degradation on Tourism Gross Value Added and the broader economic resilience. This lack of analysis prevents the determination of whether the development would yield a net economic benefit or adversely affect an established and expanding sector.

Moreover, the assessment fails to address the significance of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, including in burgeoning markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this deficiency, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community characterised by limited economic diversification, the insufficient evaluation of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have

not been assessed as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to exhibit net benefits. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Cumulatively, the failure to quantify tourism impacts, consider environmental drivers of visitor behaviour, and recognise the island's economic dependencies results in a significant evidential gap. This inadequacy hampers a thorough assessment of economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development, as evaluated against statutory duties, national policy, and evidential standards. It replicates the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is submitted under an enhanced policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A complete and reliable evidential basis for the proposal is lacking. There are significant gaps in baseline data, an undefined design envelope continues to be employed, and there is reliance on unspecified mitigation measures. Additionally, key impact pathways, including nocturnal wildlife, full onshore infrastructure, and effects on tourism, have not been included. Consequently, the Environmental Impact Assessment remains incomplete, preventing a thorough understanding of likely significant effects or residual impacts.

The application demonstrates clear procedural deficiencies. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as stipulated by the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Conflicts with the National Planning Framework 4 are evident within the proposal. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been assessed properly, concealing effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments

concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the applicable regulatory provisions to mandate the submission of the outstanding information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 29E2A014

Member of the public 1514

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 applicable marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and related documentation has highlighted significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, which raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, with baseline information being limited and inconsistent, and important elements of the proposal remaining undefined. The application employs a flexible design framework, which hinders a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are unsupported by solid evidence.

There are notable conflicts with established policies. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate that national standards for protecting biodiversity, climate interests, and environmental integrity will be satisfied. These conflicts are directly relevant to the statutory tests required for consent and impede the competent authority's ability to deem the development acceptable from a policy standpoint.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to adequately account for the likely environmental effects associated with the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty. This flexibility undermines the integrity of the assessment process and prevents a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that is ultimately built, thereby hindering both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

Furthermore, the application leans 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 mitigated later inhibits a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation strategies must be clearly established before any determination can occur.

Evidential deficiencies are also notable, with significant gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This situation results in uncertainty concerning the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information impedes a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. The precautionary principle becomes particularly relevant regarding protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and rigorous assessment of environmental effects, meaning the competent authority lacks the necessary information to make an informed decision on the application.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned analysis of alternatives, which is essential for compliance with the statutory requirements of the Environmental Impact Assessment regime. Instead of a detailed comparison of feasible alternatives grounded in environmental considerations, the documentation offers merely a narrative

of the project's development. This shortcoming indicates that less harmful options have not been thoroughly identified, evaluated, or selected over more detrimental solutions.

There is a noticeable absence of transparent, evidence-based comparisons concerning different offshore locations, scales of development, or design configurations. Specifically, the application does not illustrate that the developer has meaningfully assessed the possibility of placing turbines further offshore, an action that could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining environmental effects, this lack of analysis prohibits any conclusion that the proposed siting is indeed the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, revealing insufficient evidence of the exploration of alternative routes aimed at avoiding or minimising impacts on sensitive receptors. This includes significant locations of cultural and spiritual relevance such as Barvas Cemetery. The failure to present a clear avoidance strategy, coupled with the absence of comparative analysis, suggests that mitigation by design has not been effectively implemented, relying instead on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy and inhibits the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. In the absence of a rigorous alternatives assessment, it cannot be affirmed that the proposal stands as a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency casts doubt on 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 constitutes a material omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and does not warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly lacking, failing to provide a thorough or dependable understanding of the ecological receptors present within the West Lewis coastal environment. This area is recognised for its biological activity and sensitivity, yet the baseline data remains incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment falls short of offering a solid evidential foundation for impact evaluation.

In particular, there is a crucial oversight concerning otters, a species that is protected

under European law. The application neglects to adequately recognise and assess their active utilisation of coastal zones for both foraging and movement. This failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts arising from construction disturbance, noise, and increased human activity. Such oversights undermine any conclusions drawn regarding the absence of significant effects on this species.

The evaluation of basking sharks also reveals serious deficiencies, particularly due to the reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show frequent usage of these waters. The disregard for such pertinent data leads to an incomplete baseline and undermines the validity of the conclusions reached.

These methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Furthermore, the lack of comprehensive baseline data hampers meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true extent of the risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty arising from these deficiencies prevents the definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings obstruct a robust evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the necessary evidential standard required to demonstrate that it will not adversely affect internationally important seabird populations. With significant gaps in evidence and internal inconsistencies, the ornithological assessment is fundamentally flawed. This situation is particularly concerning given that the west coast of the Isle of Lewis is home to many seabird species that are already in decline. The assessment does not adequately evaluate the implications of habitat loss, collision risk, or displacement within key foraging areas and migratory pathways.

There is a troubling contradiction in the application: the developer asserts that there will be no significant adverse effects while simultaneously advancing a case for Habitats Regulations derogation. This derogation is only necessary when significant

harm is anticipated, which raises doubts about the reliability of the assessment and its conclusions. The evidence provided is insufficient to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds has not been sufficiently accounted for, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, where mortality rates may be underestimated.

Moreover, the siting of turbines within a recognised migratory corridor poses an additional risk, potentially creating a barrier along a primary flight path used by species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with the potential effects on species with relatively small global populations, have not been adequately assessed.

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

The deficiencies noted 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 in direct conflict with national policy.

In summary, the unreliability of the assessment, marked by internal inconsistencies, methodological weaknesses, and insufficient evidence, leads to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets rather than recognising it as a vibrant cultural landscape where environment, language, tradition, and community intertwine. This reductive approach overlooks the ongoing social, cultural, and spiritual roles that these heritage elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, yet the assessment characterises them as static features, ignoring their continued use and the implications of development on their context. This mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic

language, traditions, and the community's deep-rooted relationship with the coastal environment. These aspects are essential to the area's identity, yet they are entirely omitted from the evaluation, representing a significant gap. Without recognising these factors, the true cultural impact of the development remains unclear.

There are additional concerns regarding community rights and the lack of engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of an Indigenous People, has not been involved in a process of Free, Prior and Informed Consent. This absence of genuine participation undermines the legitimacy of the assessment and fails to uphold established principles of inclusion in decisions affecting cultural and environmental matters.

A significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination legally deficient.

From a policy standpoint, these shortcomings position the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with living cultural practices, clearly diverges from established policy requirements.

Overall, the combined failure to evaluate living heritage, intangible cultural value, community rights, and statutory requirements creates a significant evidential gap. The cultural impacts of the development have not been appropriately assessed, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report remains unpublished. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified by the developer’s own research. Summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, making them concrete rather than speculative. Nevertheless, the failure to disclose the entire assessment limits scrutiny of the findings and affects their significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Unfortunately, these 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 actual human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By failing to provide the full dataset, the application does not offer a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid causing harm, yet the available evidence indicates that there are existing adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be assured.

The procedural ramifications are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material shortcoming within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the full Social Impact Assessment, along with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation hampers a lawful determination and strengthens the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is insufficient and does not truly capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. Large-scale turbines placed near the shoreline would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct impact on visual amenity and detract from the naturalness and sense of remoteness that define the area. The assessment does not accurately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that these viewpoints might not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the scale of visual impact may have been understated, which calls the reliability of the assessment

into question.

Additionally, there is a failure to evaluate 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 linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated rather than interdependent results in a poor assessment of impacts on their setting and cultural significance.

The introduction of industrial elements to 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 issue but also broader cultural and spatial harm that has not been sufficiently analysed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of change is at odds with the requirement to maintain 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 compliance.

Moreover, the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. Consequently, the change would be fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately reflect the scale 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 landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of potential construction and pollution risks is insufficient and lacks the necessary detail to evaluate environmental effects adequately. The proposal entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, thus hindering any meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures raises significant concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide

adequate detail on how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application fails to allow for the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

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

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings prevent a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application is inadequate, lacking a thorough analysis of 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 sufficiently demonstrate how these habitats and activities will be safeguarded from significant disruption.

A critical flaw is the assumption that fishing activities can be shifted without negative consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or able to withstand increased pressure. This oversight is crucial, as the displacement of fishing activities could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a well-supported assessment, it is impossible to fully understand the impacts on fisheries and livelihoods.

The proposal poses serious risks to marine species, especially due to underwater noise generated during the construction process. Prolonged high-energy hammer piling is expected to disturb a wide area, negatively affecting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population

raises significant concerns, yet the application downplays these effects without adequate evidence.

There is a notable inconsistency in the application regarding the requirement for licences to permit harm to European Protected Species, even as it describes the impacts as negligible. This contradiction weakens the credibility of the assessment and raises issues about compliance with the Habitats Regulations, particularly when harm is expected to occur to a level that necessitates legal permission.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains 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 prove that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal aligns with sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally lacking and does not consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the associated onshore works are interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of both environmental and socio-economic effects.

Among the onshore elements are cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities entail 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 fails to provide a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are inadequately understood.

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

Concerns also arise regarding carbon balance. The disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains positive.

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, which raises serious questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove 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 segment of the application incomplete and unreliable, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This lighting fundamentally alters the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are vital to the area's environmental quality, cultural identity, and tourism potential, particularly as emerging sectors like astro-tourism grow in importance.

However, the Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, representing a material omission. This failure to consider the effects of the proposed lighting on visual amenity, landscape character, and the experiences of both residents and visitors is significant given the integral role dark skies play in the area's identity.

Moreover, there is no evaluation of the impact on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased collision risk. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and the risk of increased mortality have not been

evaluated.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity or the associated risks to species such as Kittiwakes, which may forage or migrate at night. This oversight results in a critical gap in understanding the ecological impacts. Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The application does not meet the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt, thereby engaging 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. They undermine a comprehensive assessment of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment. Collectively, the absence of any assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

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

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

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

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

habitats, and crofting land.

Environmental risks remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 160A4543

Member of the public 1515

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 arises from a thorough examination of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly pristine environment, and strong cultural heritage. Concerns about the scale, proximity, and design of the project raise questions regarding its alignment with statutory obligations, national policies, and the tenets of sustainable development.

The application does not present a sufficient evidential foundation for a lawful assessment. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal are yet to be defined. The adoption of a flexible design framework obfuscates the likely significant effects of the development, while an over-reliance on unspecified mitigation measures precludes any meaningful evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community repercussions, with assertions of negligible or non-significant impacts lacking robust evidential support.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment process, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately prove that it can satisfy national directives aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory criteria necessary for obtaining consent and hinder the competent authority's ability to conclude that the development aligns with policy standards.

The magnitude of the proposal is unprecedented for this area, with large turbines situated in close proximity to the shoreline, thus raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot facilitate a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a complete, transparent, and dependable account of the likely environmental effects associated with the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach undermines the reliability of the assessment and leads to the potential misrepresentation of the impacts, as it prevents both the public and the competent authority from comprehending the true extent of environmental effects.

Consent is sought on the assumption that environmental harm will be mitigated through undefined measures and management plans in the future. This reliance on yet-to-be-determined strategies obstructs any meaningful evaluation of their effectiveness and the assessment of residual impacts. Such deferral of essential information to the stages following consent is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which demands that likely significant effects and mitigation are clearly established prior to determination.

Moreover, the application exhibits significant evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty surrounding the scale and significance of impacts, especially when negligible or non-significant effects are suggested without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application fails to satisfy the evidential threshold outlined in the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable safeguards exist.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies obstruct a lawful and rigorous assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Instead of offering a structured comparison of viable options based on environmental effects, it provides a narrative of project evolution. This method does not sufficiently demonstrate that less harmful alternatives have been identified and evaluated in favour of more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impact, and the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging available option.

The inadequacies further extend to cable routing and landfall evaluation, where there is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The failure to present a clear avoidance strategy or comparative analysis implies that mitigation by design has not been employed, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout decisions, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy and prevents the competent authority from assessing whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

From a policy viewpoint, this inadequacy undermines alignment with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding its impact on marine ecology and protected species. The assessment conducted does not provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment, which is a highly sensitive and biologically active marine system. Incomplete baseline data and inadequate methodologies have failed to capture vital information regarding species presence, behaviour, and habitat use. Consequently, this assessment lacks a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, 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. Such deficiencies undermine any conclusions regarding the absence of significant effects on the species.

Similarly, the assessment of basking sharks suffers from reliance on aerial surveys, which introduce significant detection bias in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider these data leads to an incomplete baseline and further weakens the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The absence of sufficient baseline data also obstructs meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises serious questions about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In such circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings hinder a robust evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application is lacking a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment related to the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. The development is situated within key foraging areas and migratory pathways, yet the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss for these species.

A key contradiction exists in the application, where the developer asserts no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is typically only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not underpinned by adequate evidence. Furthermore, the assessment does not sufficiently establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling methods introduces uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality

rates, especially given incomplete baseline data and the lack of understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces a considerable risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of sustained mortality in this corridor or the potential effects on species with comparatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby preventing a lawful conclusion in support of consent. Moreover, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage related to the proposed development is fundamentally flawed, particularly regarding the West Lewis coastline, which should be recognised as a vibrant cultural landscape where community, tradition, language, and environment are deeply intertwined. The application reduces heritage to mere static assets, neglecting their active social, cultural, and spiritual relevance within the community.

Significantly, the assessment fails to accurately address culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely historical features; they serve as active sites for burial and spiritual activities. By classifying them as static, the evaluation overlooks their ongoing significance and the implications of development on their surroundings. This misrepresentation leads to a lack of thorough analysis concerning cultural effects and dismisses their importance in community life.

Moreover, the application neglects the evaluation of intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity yet are completely omitted from the assessment, marking a crucial gap. Without accounting for these elements, a true understanding of the cultural impact of

the development remains unattainable.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking community possesses a unique cultural identity as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to uphold established principles for participation in decisions that affect cultural and environmental interests.

A crucial procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to lawfully assess the social, cultural, and economic implications of the proposal on the island community. This alone renders a lawful determination impossible.

These inadequacies place the proposal in clear opposition to the National Planning Framework 4, especially regarding the protection of historic assets and sites. By neglecting both tangible and intangible heritage and failing to recognise living cultural practices, the application diverges significantly from policy expectations.

Overall, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory responsibilities results in a considerable evidential gap. The cultural implications of the development remain improperly evaluated, and the application does not provide a sound foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

There is a notable deficiency in recognising the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are linked to the wider landscape through visual and spatial relationships to the Atlantic horizon. The assessment treats these important cultural assets as isolated rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is fundamentally inadequate and lacks the necessary detail to appraise the likely environmental effects. The proposed project entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on unspecified mitigation and contingency measures to be formulated after consent, which precludes any thorough evaluation of their sufficiency or effectiveness.

This reliance on vague future actions raises serious concerns due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment

mobilisation and the potential for accidental chemical or oil spills, it does not offer adequate details on how these risks will be mitigated, controlled, or monitored.

Furthermore, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. In the absence of robust modelling and clearly delineated management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent, the application undermines the evaluation of whether sufficient safeguards are in place to address pollution incidents. This situation introduces procedural risks and impairs the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed prior to granting consent, and the absence of such information means a lawful determination cannot be achieved. Moreover, the application does not adequately 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 surrounding potential impacts make the assessment materially deficient. These flaws obstruct a thorough evaluation of construction and pollution risks and further indicate 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.

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 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 application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the standards required for sustainable development, as assessed against statutory duties, national policy, and evidential criteria. It mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application lacks a reliable evidential foundation for its determination.

Critical deficiencies exist in the baseline data provided, and the reliance on an undefined design envelope raises significant concerns. Furthermore, the proposal does not adequately specify its mitigation measures and neglects key impact pathways such as nocturnal wildlife, the implications of the full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts of the project.

Additionally, there are clear procedural violations evident in the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Moreover, the failure to fully disclose the Social Impact Assessment is a critical omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. There is also a failure to show a net economic benefit, largely due to the lack of modelling regarding tourism impacts. The cumulative impacts of both offshore and onshore elements have not been thoroughly assessed, which obscures the potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and may be

significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold needed to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing any lawful conclusion that impacts are acceptable.

Moreover, the proposal threatens to 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 negative impacts on tourism are all permanent effects that cannot be mitigated to an acceptable degree.

In summary, the application is both procedurally and substantively unsuitable for determination. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or enforce the relevant regulatory provisions to compel the submission of the missing information.

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

Additional Comments

We live in a beautiful part of the world, natural, wind farm would spoil out view affect wildlife,

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: B31F7889

Member of the public 1516

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

Dear Sir/Madam

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

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

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

The unprecedented scale of this proposal introduces large turbines in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Overall, the combination of inadequate information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally flawed, as it does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are interconnected. The approach taken in the application reduces heritage to mere isolated assets, neglecting their ongoing cultural, spiritual, and social significance within the community.

A major shortcoming is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are classified as static features in the assessment. This mischaracterisation fails to account for their continued use, the significance they hold, and the implications of development on their surroundings. Consequently, this results in an incomplete understanding of the cultural effects and ignores their importance to community life.

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These factors are integral to the area's identity, yet they are completely absent from the assessment, creating a significant gap. Without these considerations, the cultural impact of the proposed development cannot be accurately gauged.

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

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated 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 renders the determination of the proposal unlawful.

From a policy perspective, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to address both tangible and intangible heritage and to acknowledge living cultural practices represents a significant departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall assessment of health, social impacts, and wellbeing presents significant deficiencies that undermine the transparency essential for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included engagement with local residents through focus groups. However, the full report remains unpublished, creating an evidential gap that hinders both public understanding and the competent authority's ability to assess the identified social risks based on the developer's research.

Summaries that are currently available indicate that residents are experiencing notable stress, anxiety, and concern linked to the proposal's scale and proximity. These impacts arise from direct community engagement and should not be considered speculative. The absence of the complete assessment curtails scrutiny of the findings, restricting the ability to ascertain their importance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal poses a threat to community identity and cohesion, with references to "cultural loss" in the developer's own findings. Despite this, these impacts have not been adequately incorporated into the main application or given due consideration. The lack of access to the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when they may affect community character and functionality. Without providing the complete dataset, the application fails to establish a comprehensive evidential basis for weighing the benefits against the harms.

From the perspective of policy compliance, the application does not sufficiently demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, yet the available evidence indicates that existing adverse effects have not been fully addressed. In light of the absence of the complete assessment, the application cannot claim compliance with this policy.

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, marking a significant omission within the application and a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, in conjunction with the evidence of existing adverse effects, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Additionally, there is a lack of analysis concerning the interconnectedness of the landscape, seascape, and cultural heritage. Heritage sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

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

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

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

TOURISM

The assessment of tourism impacts is critically inadequate and neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or overall economic contributions.

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

The failure to consider the significance of environmental quality in enhancing tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism, further exacerbates this issue. The lack of a Dark Skies Assessment creates a considerable gap in understanding the potential impacts on this recognised and flourishing aspect of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the necessity to show net benefits. It also contradicts strategic objectives that designate tourism as a priority growth sector, lacking sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

The 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.

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: 308D1653

Member of the public 1517

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and the associated documentation, revealing material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly pristine environment, and significant cultural identity. Concerns regarding its compliance with statutory requirements, national policy, and the principles of sustainable development arise from the proposal's scale, proximity, and design.

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

The proposal presents clear and substantial conflicts with existing policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. Furthermore, the application does not demonstrate that it can meet national obligations regarding biodiversity protection, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent, compromising the competent authority's ability to conclude that the development is acceptable according to policy.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to offer a complete understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive marine system known for its biological activity, yet the baseline data is lacking, and the methodologies applied do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

A significant shortcoming is evident in the treatment of otters, a European Protected Species, where the application neglects to adequately acknowledge and assess their active use of coastal areas for foraging and movement. The assessment does not consider their core foraging range and behavioural patterns, leading to an inadequate evaluation of the potential impacts from construction disturbances, noise, and increased activity. This deficiency undermines any conclusions made regarding the absence of significant effects on otters.

Further issues arise with the assessment of basking sharks, which relies on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that demonstrate frequent usage of these waters. The failure to integrate or properly consider such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions drawn about negligible or non-significant effects are grounded in assumptions rather than robust evidence. The absence of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to

demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

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

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

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

In light of these deficiencies, the application stands in direct conflict with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects undermines compliance with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is inadequate. It fails to recognise this area as a living cultural landscape, where environment, language, tradition, and community are interconnected. The application treats heritage merely as static assets, rather than acknowledging their active social, cultural, and spiritual functions within the community.

A significant issue is the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice, yet they are regarded as static features in the assessment. This oversight

neglects their ongoing use, significance, and the potential impact of development on their surroundings, leading to an incomplete evaluation of cultural effects and overlooking their role in community life.

Moreover, the application does not assess intangible cultural heritage, such as the Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely excluded from the assessment, which is a notable omission. The cultural impact of the development cannot be properly understood without considering these factors.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

A critical failure in procedure 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 meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission prevents a lawful determination.

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant gap in evidence. The cultural impacts of the development have not been adequately 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 failure to publish the complete Social Impact Assessment raises serious concerns regarding the social impacts, health, and wellbeing of the community. Although the developer engaged local residents through focus groups, the absence of the full report creates a critical evidential gap that hinders public understanding and the competent authority's evaluation of the identified social risks. This lack of transparency not only undermines public trust but also obstructs proper scrutiny of the findings, which are vital for determining their significance in the decision-making process.

Available summaries show that residents are already experiencing significant stress,

anxiety, and concern related to the scale and proximity of the proposed development. These impacts, rooted in direct community engagement, are concrete and not speculative. Additionally, there is evidence 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 critical impacts have not been adequately integrated into the main application or considered with the seriousness they deserve. Consequently, withholding the full assessment obscures the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. For developments of such magnitude, it is essential to fully understand the social, economic, and health implications, especially when community character and functioning are at risk. The omission of the complete dataset within the application denies a comprehensive evidential basis for balancing potential benefits against the associated harms.

From a policy standpoint, the application fails to comply with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to demonstrate compliance with this crucial policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission constitutes a material failure within the application, breaching the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This undermines the potential for a lawful determination and firmly indicates that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This development would create a continuous industrial presence that fundamentally alters the existing landscape, resulting in a permanent and irreversible transformation. The application fails to accurately represent the magnitude of visual change that would result from the turbines, which would dominate views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and eroding the qualities of naturalness and remoteness.

Additionally, there are methodological issues concerning the selection and presentation of visual viewpoints within the assessment. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case

scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of understating the visual impact, which ultimately undermines the reliability of the entire assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated rather than recognising their interdependence, the assessment results in an incomplete evaluation of the impacts on their setting and cultural significance. The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This effect represents not only a visual impact but also a broader cultural and spatial harm that the application fails to adequately assess.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further detracts from any claims of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The 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 waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application fails to provide a thorough evaluation of the ecological and socio-economic impacts associated with the proposal. There is a pressing concern regarding the assumption that fishing activities can be displaced without any consequences. The lack of evidence demonstrating that alternative fishing grounds are available and able to support additional pressure is particularly concerning. This oversight could lead to overfishing in other areas, impacting the livelihoods of the local fishing fleet.

Moreover, the proposal poses significant risks to marine species, especially through the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disturb marine life across large distances, affecting species such as dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population raises serious alarms, yet the application tends to downplay the significance of these effects, lacking sufficient supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it

simultaneously describes these impacts as negligible. This contradiction raises serious concerns regarding compliance with the Habitats Regulations, particularly in instances where harm is anticipated to a level requiring legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with the project, including cabling across protected moorland and the construction of a substation near Stornoway, introduce significant risks to sensitive habitats. The proposed access infrastructure runs through landscapes that are ecologically fragile, particularly involving excavation across deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which hinders a full understanding of the project's environmental footprint.

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

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

The disturbance of peatland associated with these works raises serious concerns about carbon balance. The release of stored carbon could lead to a carbon debt that undermines the very objectives of renewable energy development. Yet the application

does not sufficiently address this issue or demonstrate that the overall carbon balance remains positive.

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

From a policy standpoint, the failure to assess the project holistically and to demonstrate protection for peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Consequently, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that would be visible over considerable distances, creating an intrusive “wall of light” effect across the western horizon. This alteration to the night-time environment is significant, particularly as the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. The importance of preserving dark skies is underscored by the area's identity and the growth of tourism sectors such as astro-tourism.

Moreover, the Environmental Impact Assessment does not address the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that the application overlooks the potential adverse effects of aviation lighting on these species, increasing their mortality risk.

The issue is further compounded by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated hazards. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation from artificial lighting. This lack of site-specific night-time data highlights a critical gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural spaces and environmental integrity. They also undermine the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

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

TOURISM

The proposal for large-scale offshore infrastructure lacks a comprehensive assessment of its tourism impacts, which is essential given the importance of this sector to the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to quantify how the proposed developments would influence visitor numbers, behaviour, or their overall economic contribution.

Tourism on the Isle of Lewis has seen significant growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island’s economy. However, the proposal does not analyse how the industrialisation of the seascape and potential decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the area. Without such an analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment neglects the significance of environmental quality in enhancing the tourism experience, especially regarding the preservation of unspoiled landscapes and dark skies. This oversight is especially critical for emerging sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the potential impacts on this growing aspect of the local economy.

In an island community characterised by limited economic diversification, the neglect of tourism impact assessments holds broader implications for employment, local enterprises, and the sustainability of the community. The absence of an appropriate Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated in line with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly concerning economic impacts and the necessity to illustrate net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the economic dependencies of the island culminate in a significant evidential gap. This inadequacy hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. The application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. This current proposal is put forth under a policy framework that supposedly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not satisfy these requirements.

There are substantial shortcomings in the evidential basis for determining the application. Critical gaps exist in baseline data, with an undefined design envelope and unspecified mitigation measures. Furthermore, key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of potential significant effects and residual impacts.

Additionally, procedural issues are evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to present a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impact of offshore and onshore components has not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle, which prevents a lawful conclusion that impacts are acceptable.

Furthermore, the proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and negative implications for tourism are all permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

I have autism.

The wind turbines are an assault to my high sensitivities.

This will ruin my present, and my future.

This is my family croft. I have my pets and my garden here. I have my own room.

But I will have to move houses… because the Scottish government and our politicians did not stand up for my right to a peaceful home as a disabled person.

The planning procedure has failed to make reasonable adjustments for people with disabilities,

and there is indirect discrimination through inaccessible process.

NO TO N4!

I OBJECT TO N4.

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: 92501AE7

Member of the public 1518

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a complete, transparent, or dependable account of the expected environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty impedes the application of a worst-case scenario assessment, thus compromising the integrity of the evaluation. Consequently, the impacts illustrated may not correspond to the development that is ultimately realised, hindering both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application significantly relies on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach requests consent under the premise that environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of effectiveness or understanding of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment framework, which mandates that likely significant effects and their mitigation be clearly identified before a determination is made.

There are critical evidential shortcomings, including deficiencies in baseline data, constraints in methodology, and dependence on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty regarding the magnitude and significance of impacts, particularly when negligible or non-significant effects are posited without robust supporting evidence. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it fails to establish that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, 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 unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in its assessment of marine ecology and protected species, failing to establish a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. The marine system in question is notably sensitive and biologically active; however, the baseline data

provided is incomplete, and the methodologies employed do not effectively capture essential information regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A critical oversight involves otters, which are classified as a European Protected Species. The application does not adequately recognise or assess the active use of coastal areas by otters for foraging and movement. This gap in consideration of their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain inadequately evaluated. As a result, conclusions drawn regarding the absence of significant effects on otters are undermined.

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

The methodological limitations identified mean that the conclusions drawn regarding negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies precludes the possibility of excluding adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, the granting of consent cannot be legally justified.

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

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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is not only incomplete but fails to capture the full extent of impacts from what constitutes a single integrated project. The offshore turbines are connected to the onshore works, yet these elements are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment in the application means that the overall environmental footprint of the project is not fully understood.

By excluding or deferring the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project must be considered collectively. However, the separation of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been put in place. This gap raises significant concerns regarding biodiversity protection.

The proposal also brings forth issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this concern or show that the overall carbon balance is beneficial.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is insufficient evidence in the application indicating that necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

In summary, the separation of project components, the absence of comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, preventing 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 fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This application echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a thorough and reliable evidential basis.

Critical gaps in baseline data are evident, alongside the continued use of an undefined design envelope and an overreliance on unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and residual impacts.

There are also clear procedural failures associated with the proposal. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a material omission. These deficiencies impede the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct conflict with the National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not establish 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. Furthermore, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent, and the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, preventing a lawful conclusion that impacts are acceptable.

The proposal would bring about substantial and irreversible change 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 scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information.

For these reasons, a formal request is made that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

This windfarm will forever negatively impact the people of the Hebrides, the place as we all know and love it, and it will never be possible to regain what is lost. Financial gain for an international company is not an adequate reason to damage our heritage, our community and our wild spaces - not to mention the mental and physical health of the people of the Hebrides, as well as the marine life of the Hebrides. Our homes rely on tourism significantly, and this industrial development risks that significant income stream. The community would welcome small, community owned wind power that directly benefited the community- in a scale and approach befitting the landscape and

the culture. This does neither of those things, and can not be allowed to proceed. Please stop this before it is too late.

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: 79FC71AA

Member of the public 1519

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 existing documentation highlights significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural identity. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and the principles of sustainable development.

There is a lack of adequate evidential basis for a lawful determination within the application. Critical environmental data is absent, baseline information is both limited and inconsistent, and several key components of the proposal remain undefined. The application's reliance on a flexible design framework obstructs a clear understanding of potential significant effects. Furthermore, the dependency on unspecified mitigation measures means their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of enabling a comprehensive or informed understanding of environmental, cultural, or community impacts, while assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. 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. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and weaken the capacity of the competent authority to determine that the development meets acceptable policy standards.

The scale of the proposed project is unprecedented in this area, with large turbines planned in close proximity to the shoreline. This raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In such circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to provide a clear, reliable account of the potential environmental effects of the proposal. The absence of fixed turbine dimensions, layouts, or configurations due to the flexible Project Design Envelope creates significant uncertainty. This lack of commitment undermines the assessment's integrity and prevents both the public and the competent authority from grasping the actual extent of the environmental effects, as the impacts presented may not accurately reflect the development that will ultimately be constructed.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent with the understanding that environmental harm will be addressed later does not allow for a meaningful evaluation of effectiveness or the assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally inappropriate and contradicts the Environmental Impact Assessment regime's purpose, which necessitates a clear establishment of likely significant effects and mitigation prior to determination.

Additionally, the report suffers from substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty about 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 and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be evidenced that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects and mean that the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally inadequate and fails to meet the statutory obligations set forth by the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on environmental impacts, the application provides a narrative detailing the evolution of the project. This method does not establish that less

harmful options have been adequately identified, evaluated, and preferred over more damaging alternatives.

There is a clear lack of transparent, evidence-based comparisons concerning offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered the potential for placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining the extent of impact make the absence of such analysis significant. This void prevents any conclusion that the proposed siting is indeed the least damaging option available.

The issues extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence indicating that alternative routes have been adequately considered to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid such impacts, combined with the absence of comparative analysis, suggests that mitigation by design has not been adequately applied, resulting instead in a reliance on post-design measures to address potential harm.

Consequently, the application does not demonstrate that environmental harm has been sufficiently minimised through careful site selection, layout, and the routing of infrastructure. This is indicative of a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community well-being. The lack of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not undergone adequate evaluation and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant shortcomings in its assessment of marine ecology and protected species, leading to an inadequate understanding of the ecological receptors within the West Lewis coastal environment. This area, characterised by its biological activity, has been the subject of a baseline data collection that is notably incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to establish a reliable evidential foundation for evaluating potential impacts.

Particularly concerning is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge their

active foraging and movement within coastal areas. The lack of an assessment of their core foraging range and behavioural patterns means that the possible impacts from construction activities, including noise and increased human presence, have not been sufficiently examined. This lack of thoroughness undermines the validity of the claim that there would be no significant effects on this species.

Further issues are evident in the evaluation of basking sharks, where reliance on aerial surveys introduces a notable detection bias, particularly under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, especially in light of established land-based observations that indicate frequent usage of these waters. The failure to adequately incorporate or consider this data contributes to a deficient baseline and diminishes the credibility of the conclusions drawn.

These methodological shortcomings result in assertions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hampers the ability to carry out meaningful assessments of cumulative and indirect impacts, including those influenced by seasonal changes and broader ecosystem interactions. This introduces significant uncertainty about the actual risks faced by marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed the protected species present. The uncertainty created by these deficiencies prevents a dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In this context, granting consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally lacking, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. The application employs a narrow perspective, treating heritage merely as a collection of static features instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the assessment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual activities, yet they are regarded as unchanging elements, neglecting their continued significance and the implications of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural impacts and dismisses their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity but are conspicuously absent from the evaluation, representing a critical gap. Without acknowledging these factors, the true cultural implications of the proposed development remain obscured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking community has a distinct cultural identity, characterised as an Indigenous People, yet the necessary process of Free, Prior and Informed Consent has not been undertaken. This lack of genuine engagement compromises the credibility of the assessment and fails to align with established principles concerning participation in decisions that affect cultural and environmental matters.

Another major oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This evaluation is essential for the competent authority to legally assess the social, cultural, and economic repercussions on the island community. Its absence alone prevents a lawful consideration of the proposal.

From a policy standpoint, these inadequacies place the development in direct opposition to the National Planning Framework 4, especially regarding the preservation of historic assets and sites. The failure to account for both tangible and intangible heritage, as well as to recognise active cultural practices, signifies a blatant disregard for policy stipulations.

Overall, the neglect to evaluate living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential void. The cultural repercussions of the development have not been adequately examined, leaving the application without a sufficient foundation for assessing the genuine cultural consequences of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the complete Social Impact Assessment significantly undermines the ability to properly evaluate the social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the lack of transparency regarding the full report creates an evidential gap that hinders public understanding and the competent authority’s ability to assess the social risks highlighted in the developer's research.

Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation, yet without access to the full assessment, proper scrutiny of the findings is unattainable. This limitation restricts the ability to ascertain the significance of these impacts in the decision-making process.

Moreover, there is clear evidence indicating that the proposal threatens community identity and cohesion, with references to “cultural loss” found within the developer’s own documentation. However, these findings have not been adequately integrated into the main application or given the weight they deserve. By withholding the complete Social Impact Assessment, the developer obscures the true human and social cost of the proposed development.

The lack of transparency also jeopardises the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The absence of the complete dataset means that the application does not provide a comprehensive evidential basis necessary for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm, yet the evidence at hand suggests existing negative effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy framework.

The procedural ramifications are considerable. 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 critical omission in the application and fails to satisfy the evidential criteria set forth by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in the assessment of seascape, landscape, and visual impacts, failing to adequately convey the extent of change or the sensitivity of the environment affected. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would introduce a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Concerns arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not accurately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This issue raises the possibility that the magnitude of the visual impact has been understated, casting doubt

on the reliability of the assessment.

The application also inadequately addresses the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. Rather than acknowledging this interdependence, the assessment treats these assets as isolated, resulting in a limited evaluation of the impacts on their setting and cultural importance.

Moreover, the proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not only a visual impact but a broader cultural and spatial detriment that remains insufficiently addressed in the application.

From a policy standpoint, the proposal conflicts with the National Planning Framework 4, particularly concerning the safeguarding of natural areas and historic assets. The magnitude of change proposed is inconsistent with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any assertions of compliance with relevant policies.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resulting changes are fundamental and permanent, rendering mitigation efforts unlikely to achieve an acceptable outcome.

Overall, the assessment does not accurately reflect the scale of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the assertion that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life in the application is inadequate, failing to present a solid analysis of ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application does not prove that these habitats and uses can be preserved without causing significant disruption.

A major concern is the claim that fishing activities can be shifted without repercussions. The application lacks proof that alternative fishing areas exist, are accessible, or can handle increased fishing pressure. This gap is critical, as displacement could lead to overfishing in other locations, with potential negative effects on the local fishing fleet's economy. Without a detailed and evidence-based analysis, it is impossible to fully grasp the implications for fisheries and community livelihoods.

The proposal also poses serious risks to marine species due to underwater noise from construction activities. The use of high-energy hammer piling for extended periods is expected to create disturbances that could affect marine life over large areas, specifically impacting dolphin populations. The anticipated disturbance to a significant

segment of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these impacts without adequate evidence.

There is a notable inconsistency in the application, where the requirement for licences to authorise harm to European Protected Species is acknowledged, while impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises issues related to compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

The analysis also overlooks the cumulative effects of various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. A thorough examination of these combined impacts is necessary to determine the overall effects on marine ecosystems and socio-economic conditions.

From a policy viewpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which hinders any assertion that the project constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is not only incomplete but fails to capture the full extent of impacts from what constitutes a single integrated project. The offshore turbines are connected to the onshore works, yet these elements are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment in the application means that the overall environmental footprint of the project is not fully understood.

By excluding or deferring the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project must be considered collectively. However, the separation of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been put in place. This gap raises significant concerns regarding biodiversity protection.

The proposal also brings forth issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this concern or show that the overall carbon balance is beneficial.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is insufficient evidence in the application indicating that necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include an evaluation of dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon and fundamentally transforming the night-time environment.

This proposal lacks an assessment of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, which is particularly concerning given the importance of dark skies to the region's identity and to the growth of sectors such as astro-tourism. The absence of consideration for these impacts indicates a clear gap in the overall landscape and environmental analysis.

Moreover, the application does not evaluate the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly vulnerable to artificial lighting due to their sensitivity to phototaxis, which can cause disorientation and increase the risk of collisions. Without a lighting impact assessment or a study on phototaxis, the application fails to determine how the

proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this oversight, as it does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential impact has gone unassessed. The lack of site-specific data regarding night-time activity creates a critical gap in understanding the ecological impacts of the proposal.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The standard of evidence required to exclude adverse effects beyond reasonable scientific doubt is not met, thus necessitating the precautionary principle and impeding a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4's objectives concerning the protection of natural places and environmental quality. Additionally, they undermine the comprehensive evaluation of landscape and seascape impacts since the character of the night-time environment is a vital aspect of the ecosystem.

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

TOURISM

The assessment of tourism impacts associated with the application is fundamentally flawed and does not adequately evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. With tourism having expanded notably from £65 million in 2017 to over £81.5 million, it currently supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. However, the application does not adequately model how the industrialisation of the seascape and the potential degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the community.

Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery but fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contribution. Additionally, the assessment neglects to address the critical role of environmental quality in enhancing the tourism experience, particularly regarding unspoiled landscapes and dark skies, which are increasingly important for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, resulting in a significant gap in understanding

the impacts on a recognised and growing segment of the local economy.

Given that the island community has limited economic diversification, the failure to assess impacts on tourism carries broader implications for local employment, businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018. Furthermore, from a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the need to show net benefit. It also contradicts strategic objectives identifying tourism as a priority growth sector and lacks sufficient evidence for the competent authority to adequately assess the economic consequences of the proposal.

In summary, the combined failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and acknowledge the island's economic reliance on tourism creates a considerable evidential gap. This deficiency hinders a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal illustrates a significant failure to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application revisits the central issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was deemed unacceptable due to the extent of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

There is an evident lack of a comprehensive and reliable evidential basis for decision-making within this application. Notable gaps exist in baseline data, the proposal relies on a vague design envelope, mitigation measures remain unspecified, and crucial impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications have not been addressed. Consequently, the Environmental Impact Assessment is incomplete and does not provide a full understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes statutory obligations as outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a significant oversight. 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.

This proposal stands in direct opposition to the National Planning Framework 4. It lacks evidence of biodiversity protection, preservation of natural environments and cultural

heritage, acceptable health and wellbeing impacts, and fails to demonstrate a net economic benefit due to the absence of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent with each other. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Additionally, the proposal would induce considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism signify permanent impacts that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, coupled with policy inconsistencies and unresolved environmental risks, hinder the possibility of a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or utilise relevant regulatory provisions to demand 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

As a resident of the inner Hebrides I am in absolute opposition to the damage industrial scale commercial infrastructure will do to this sensitive wild place. We are custodians of this place and to allow the damage this will do to to people, animals, birds, environment for the benefit of shareholders would be a national disgrace

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 734F16D3

Member of the public 1520

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents reveals significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The considerable scale, proximity, and design of the proposal lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis required for a lawful decision. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, complicating the assessment of likely significant effects. The flexible design framework further obscures understanding, and the reliance on unspecified mitigation measures prevents any evaluation of their effectiveness. Consequently, the documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by solid evidence.

Moreover, the proposal presents clear and substantive conflicts with existing policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is no demonstration that the national requirements to protect biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts challenge the statutory tests for consent and jeopardise the ability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal raises further alarm, as large turbines are planned to be situated close to the shoreline, raising significant issues relating to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicate that the application is incomplete and cannot sustain a 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 lacks material completeness and does not deliver a transparent or reliable account of the expected environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates considerable uncertainty. This situation hinders the consistent application of a worst-case scenario analysis. Consequently, the integrity of the assessment is compromised, meaning that the impacts presented may not accurately reflect the development that will ultimately be constructed. This deficiency obstructs both public and competent authority understanding of the true extent of the environmental effects.

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

Additional evidential deficiencies are apparent, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obscures a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of project evolution that does not

adequately demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging solutions.

There is a clear absence of transparent comparison regarding alternative offshore sites, development scales, and design configurations. The application notably does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely diminish. The West Lewis coastline's sensitivity and the importance of proximity to shore in assessing impact render this lack of analysis particularly concerning, as it prevents any conclusions that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where the evidence provided is insufficient to suggest that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors. This includes significant cultural and spiritual sites like Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been considered, leading to a reliance on post-design mitigation measures instead.

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

From a policy standpoint, this deficiency raises serious concerns regarding adherence to National Planning Framework 4, especially in terms of protecting natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of the marine ecology and protected species is fundamentally flawed, resulting in an incomplete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the methodologies applied do not adequately capture crucial details regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

Among the significant gaps is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal zones for foraging and movement. By failing to assess their core foraging range and behavioural patterns, the potential effects of construction-related

disturbances, noise, and increased activity remain unexamined. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Moreover, the evaluation of basking sharks reveals further shortcomings. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic weather conditions, likely leading to an underestimation of their presence. This is in stark contrast to established land-based observations, which indicate that these waters are frequently utilised by the species. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline, which in turn diminishes the reliability of the conclusions drawn.

The methodological limitations present in the assessment result in conclusions regarding negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including those associated with seasonal variations and interactions within the wider ecosystem. This uncertainty raises questions about the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty precludes the ability to dismiss adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is evident that consent cannot be lawfully granted.

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 impacts on marine ecology and protected species, leading to the conclusion that the application does not provide 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 assessment related to cultural heritage and community identity is deeply flawed, particularly in its treatment of the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are intertwined. This application diminishes heritage to a collection of disconnected, static assets, neglecting their active social, cultural, and spiritual roles within the community.

A significant oversight is evident in the evaluation of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as living places of burial and spiritual engagement, yet they are misrepresented as static features. This failure to acknowledge their ongoing use and significance not only leads to an incomplete understanding of cultural impacts but also overlooks their integral role in community life.

Additionally, the assessment neglects intangible cultural heritage, including the Gaelic language and traditions, alongside the long-established connection between the community and their coastal environment. These aspects are essential to the identity of the region, yet they are entirely omitted from the analysis, leaving a considerable gap in understanding the cultural ramifications of the development.

There are further issues regarding community rights and the lack of engagement with the Gaelic-speaking population, who possess a distinct cultural identity akin to Indigenous Peoples. The absence of a Free, Prior and Informed Consent process calls into question the validity of the assessment and contravenes recognised participatory principles in decisions that affect cultural and environmental interests.

Moreover, there is a critical procedural shortcoming due to the failure to conduct a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination unlawful.

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

Ultimately, the combined neglect of living heritage, intangible cultural significance, community rights, and statutory obligations creates a substantial evidential void. The cultural effects of the proposed development have not been adequately evaluated, leaving the application insufficient for a thorough assessment of the true cultural costs involved.

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 fails to adequately reflect the scale of change and the sensitivity of the receiving environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness, would face a fundamental alteration due to the introduction of large-scale turbines near the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation of the landscape.

Moreover, the application does not sufficiently represent the magnitude of the visual change, as the scale and proximity of the turbines would significantly dominate views from residential areas, historic sites, and popular coastal locations. Such changes would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of these impacts in relation to a sensitive landscape.

There are substantial methodological concerns regarding how visual viewpoints were selected and presented. It appears that the chosen viewpoints may not fully reflect the most sensitive receptors or represent worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, compromising the reliability of the

assessment.

Additionally, the interconnected relationship between landscape, seascape, and cultural heritage has not been adequately considered. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context linked to the Atlantic horizon by visual and spatial relationships. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, fundamentally altering how heritage assets are perceived and disrupting their connection to the natural horizon. This represents not merely a visual impact but a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The proposed changes are incompatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further undermines any assertion of policy compliance.

Finally, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, rather than amendable to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that would be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail on how these risks will be prevented, controlled, or

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

Furthermore, the lack of detailed emergency response procedures raises additional concerns. By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether appropriate safeguards are in place to respond to pollution events. This creates procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated prior to consent, and when this information is absent, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries related to the proposed development is inadequate, failing to address the ecological and socio-economic impacts thoroughly. The West Lewis coast is home to a vibrant marine ecosystem and a fishing industry that could be adversely affected, yet the proposal does not adequately ensure the protection of these vital resources.

A significant concern arises from the assumption that displacing fishing activities will not have negative repercussions. The application lacks evidence regarding the availability and accessibility of alternative fishing grounds that could accommodate additional fishing pressure. This gap in information is critical, as it poses a risk of overfishing in other areas and could lead to economic challenges for local fishermen. Without a well-supported assessment, it is impossible to fully grasp the implications for fisheries and the livelihoods depending on them.

The proposal also poses serious threats to marine species due to construction-related underwater noise. Extended hammer piling is anticipated to disturb marine life over considerable distances, including species such as dolphins. The potential impact on a significant portion of the local bottlenose dolphin population is a serious concern, yet the application appears to minimise these effects without adequate evidence.

Moreover, there is an evident contradiction within the application. While it acknowledges the need for licences to mitigate harm to European Protected Species, it simultaneously claims that the impacts will be negligible. This inconsistency calls into question the reliability of the assessment and raises issues regarding adherence to the Habitats Regulations, especially given that some level of harm is anticipated.

Cumulative impacts resulting from various pressures, such as noise, habitat disturbance, and fishing activity displacement, are not adequately addressed in the assessment. A failure to evaluate these combined effects means that the overall impact on marine ecosystems and socio-economic conditions remains unclear.

From a policy standpoint, the proposal does not align with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that it can coexist with current marine users or prevent detrimental effects on marine biodiversity, thus failing to establish itself as a sustainable development.

In summary, the deficiencies surrounding fishing displacement evidence, the minimisation of acoustic impacts, and the inconsistencies within the application make the assessment incomplete and unreliable. These issues hinder a thorough evaluation of the proposed project's effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant shortcomings in assessing the onshore infrastructure, resulting in a fragmented evaluation that overlooks the interconnected nature of the offshore turbines and onshore works. This separation obscures the full scale of environmental and socio-economic impacts stemming from what is fundamentally a single integrated project.

The onshore components involve crucial elements such as cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and related access infrastructure through sensitive landscapes. Importantly, excavation activities will occur in deep peat areas, notably within Barvas Moor, which serves as both a critical carbon store and an ecologically sensitive habitat. However, the application fails to offer a thorough assessment of these impacts, resulting in a lack of clarity regarding the project's overall environmental footprint.

Moreover, the exclusion or postponement of evaluating onshore impacts significantly hampers the ability to understand cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are examined collectively; yet, by treating offshore and onshore aspects separately, the application fails to fully address the combined consequences on peatlands, local habitats, and surrounding communities.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which have policy protections in place. The application

does not convincingly demonstrate that the effects on these habitats have been comprehensively assessed or that suitable avoidance measures are in place, highlighting a critical evidential gap in terms of biodiversity protection.

Additionally, concerns surrounding carbon balance arise from the potential release of stored carbon due to peatland disturbance, which could lead to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this issue or confirm that the overall carbon balance remains positive.

The routing of infrastructure across active croft land further complicates matters, potentially conflicting with established land use and legal rights. The application lacks evidence to support that the necessary consents or processes have been initiated, casting doubt on the feasibility and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project holistically and to demonstrate adequate protection for peatlands, habitats, and land use interests stands in conflict with both 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 division of project components, the lack of thorough assessment, and insufficient evidence regarding environmental and land use impacts collectively render this aspect of the application incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it entirely lacks an evaluation of dark skies and nocturnal wildlife, which constitutes a material omission. The West Lewis coastline is noted for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly consequential given the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The lack of such assessments creates a distinct gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting, which can result in disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means there is no understanding of how aviation lighting may affect these

species or contribute to higher mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data leaves a critical void in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not fulfilled, thereby invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a crucial element of the overall setting.

In conclusion, the absence of assessments related to dark skies and nocturnal wildlife represents a significant evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for a lawful determination.

TOURISM

The assessment of tourism impacts related to the application is inadequate and overlooks the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not consider how the industrialisation of the seascape and the loss of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the development would yield a net economic benefit or negatively impact an established and expanding sector.

Furthermore, the assessment neglects to address the significance of environmental quality in enhancing tourism, including the value of unspoiled landscapes and dark skies to visitor experiences. This is particularly relevant for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding how the

proposal could affect this recognised and developing aspect of the local economy.

In an island community that faces challenges in economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment signifies that these economic vulnerabilities have not been assessed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to illustrate net benefit. It contradicts strategic goals that identify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the failure to quantify tourism impacts, analyse environmental factors affecting visitor behaviour, and acknowledge the island's economic dependence leads to a significant evidential void. This hampers a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is procedurally and substantively unfit for determination, highlighting significant deficiencies in information and clear policy conflicts. The proposal fails to meet the requirements of sustainable development, not only in terms of statutory duties but also when measured against national policy and evidential standards. It echoes the unresolved core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the application, which uses an undefined design envelope and relies on unspecified mitigation measures. This lack of clarity extends to significant omissions, such as the failure to address impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, inhibiting an adequate understanding of potential significant effects or residual impacts.

There are also notable procedural shortcomings. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment represents a material omission. These issues obstruct 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 conflicts with the National Planning Framework 4, as it does not adequately demonstrate protection for biodiversity, natural places, and cultural

heritage. Furthermore, it fails to provide acceptable evidence regarding health and wellbeing impacts, alongside a lack of tourism impact modelling that prevents a demonstration of net economic benefit. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and blocking a lawful conclusion that impacts are acceptable.

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

In light of these considerations, it is evident that the scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, a formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

This will destroy our island, for the sake of lining pockets of others who don't even live in this country. We don't need more turbines to tick some boxes. Our island tourism depends on having uninterrupted coastal views.

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: 6F5C4F73

Member of the public 1521

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 highlights significant deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects based on an evaluation of the Environmental Impact Assessment Report and accompanying documents. Located off the west side of the Isle of Lewis, the area is noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The development's scale, design, and proximity to the shoreline raise essential concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a robust evidential foundation for a lawful decision. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent, and several crucial elements of the proposal remain undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, while the unspecified nature of proposed mitigation measures limits any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, making unsupported claims of negligible or non-significant effects.

There are significant policy discrepancies, as the proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident in terms of biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines planned in close proximity to the shore, raising considerable concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of sufficient information, the dependence on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance, it is clear that the application is incomplete and does not support a lawful determination. In this context, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks sufficient transparency and reliability in conveying the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the integrity of the assessment, leading to potential discrepancies between the projected impacts and the actual development, thereby hindering both public understanding and the competent authority's ability to gauge the full extent of environmental effects.

Furthermore, the application is predominantly contingent on mitigation measures, monitoring strategies, and management plans that are not yet established. As a result, consent is requested based on the expectation that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of these measures' effectiveness or a comprehensive assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly defined before determination.

There are notable evidential shortcomings, such as gaps in baseline data, limitations in methodology, and the reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a thorough understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

Consequently, the application does not meet the evidential standards stipulated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes directives related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been comprehensively assessed or that suitable safeguards are in place.

In conclusion, the dependency on an undefined design envelope, the lack of specified mitigation measures, and the inadequacies in baseline data all contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental impacts, leaving the competent authority ill-equipped to make a determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The application has significant deficiencies in the assessment of alternatives, which fails to comply with the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of

realistic alternatives based on their environmental effects. Instead, it offers a narrative about the project's evolution, which does not adequately show that less harmful options have been thoroughly identified, assessed, and chosen over more damaging ones.

There is a lack of transparent and evidence-based comparisons for alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where the impacts on visual, ecological, and coastal factors would likely be lessened. The sensitivity of the West Lewis coastline makes this analysis crucial, as proximity to the shore is essential in determining the project's overall impact. The failure to include such an analysis means there is no basis to conclude that the chosen site represents the least damaging option.

This inadequacy is also present in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that the application has not employed mitigation by design, relying instead on post-design measures.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and impedes the competent authority's ability to determine if less harmful and more suitable alternatives are available. The lack of a robust assessment of alternatives raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application lacks adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species in the application is insufficient, leading to an incomplete understanding of ecological receptors in the West Lewis coastal area. This marine environment is known for its sensitivity and biological activity, yet the baseline data provided is inadequate, and the methods employed do not sufficiently identify species presence, behaviour, or habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for determining potential impacts.

One critical area of concern is the failure to adequately assess otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their active use of coastal regions for foraging and movement. This

oversight neglects their core foraging range and behavioural characteristics, leading to an inadequate evaluation of the impacts arising from construction disturbances, noise, and heightened activity. Such omissions undermine any assertions about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys that may introduce significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks when compared to established land-based observations, which indicate their frequent usage of these waters. By failing to integrate or adequately consider this data, the assessment presents an incomplete baseline that diminishes the validity of its conclusions.

These methodological shortcomings result in the assessment's conclusions of negligible or non-significant effects being based more on assumptions than on substantiated evidence. The lack of adequate baseline data inhibits a thorough evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty casts doubt on the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the standards set by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies precludes a definitive conclusion regarding the absence of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, the granting of consent would not be legally justified.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and conclusions that lack support renders the assessment unreliable. These inadequacies hinder a comprehensive evaluation of impacts on marine ecology and protected species, affirming that the application does not possess a sufficient evidential basis.

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 West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets rather than recognising their ongoing social, cultural, and spiritual relevance 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. Despite their continued use and significance, the

assessment categorises them as static features, neglecting their ongoing meaning and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The assessment also fails to account for intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the evaluation, representing a significant oversight. Ignoring these factors means that the true cultural impact of the development cannot be accurately assessed.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity recognised as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018, highlights a critical procedural failure. 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 oversight alone hinders a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is inadequate and lacks the necessary transparency for a lawful evaluation. While the developer engaged local residents through a commissioned Social Impact Assessment and focus groups, the full report remains unpublished. This omission creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks highlighted by the developer’s research.

Moreover, available summaries reveal that residents are already facing measurable

stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement, not speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings adequately or ascertain their significance within the decision-making framework.

There are also indications that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” mentioned in the developer’s own findings. Despite the recognition of these impacts, they have not been sufficiently integrated into the main application or given due consideration. The withholding 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 thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be adversely affected. The failure to provide the complete dataset means the application does not present a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the available evidence suggests existing negative effects that remain undisclosed. Without the full assessment, it is impossible to prove compliance with this policy.

The procedural implications are substantial. 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 a failure to meet the evidential standards of the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, seascape, and landscape impacts is significantly lacking and does not adequately capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic views, undeveloped nature, and pronounced sense of remoteness. Introducing large turbines near the shoreline would create a dominant industrial presence that fundamentally transforms this character, leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the magnitude of this visual change accurately. The size and close proximity of the turbines would overshadow views from

residential areas, historic locations, and popular coastal sites, directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not sufficiently illustrate the significance of this impact in the context of such a delicate landscape.

Methodological issues also arise concerning how visual viewpoints have been selected and presented. There is evidence to suggest that these viewpoints may not fully encompass the most sensitive receptors or worst-case scenarios, particularly regarding critical cultural heritage sites and valuable landscapes. This raises concerns that the scale of visual impact may have been underestimated, thus compromising the assessment's reliability.

Additionally, the application neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially connected to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete evaluation of 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 signifies not only a visual impact but also a more profound cultural and spatial detriment that has not been sufficiently appraised in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic sites. The extent of change is incompatible with the imperative to protect 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 impacts identified cannot be mitigated effectively. Given the size, height, and proximity of the turbines, their presence would be intrusive and unavoidable. As a result, the change would be fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks adequate assessment regarding construction and pollution risks, failing to provide sufficient detail necessary for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within the high-energy Atlantic environment, yet the application does not include comprehensive

Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent, which hampers any meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming, considering the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, which are susceptible to sediment disturbance and contamination. Although the application recognises risks like sediment mobilisation and accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

Furthermore, there is significant uncertainty surrounding the scale and behaviour of sediment plumes that could 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 implications of these impacts. This uncertainty also extends to potential effects on marine species and habitats, which have been identified as sensitive within the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to tackle pollution incidents. This situation introduces procedural risk and undermines the capacity of the competent authority to properly 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 imperative that likely significant effects and mitigation measures are assessed prior to consent, and the absence of such critical information renders a lawful determination impossible. The application also fails to demonstrate adherence to policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment fundamentally deficient. These inadequacies hinder a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, lacking a thorough evaluation of ecological and socio-economic repercussions. The coastal waters off West Lewis host a diverse marine ecosystem alongside an active fishing industry. However, the application fails to demonstrate how these vital habitats and activities can be preserved without significant disruption.

A critical concern lies in the assumption that fishing activities can be relocated without negative consequences. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can accommodate the additional pressures that may arise. This oversight is particularly important, as displacing fishing efforts could lead to overfishing in other areas, which may result in broader economic ramifications for the local fishing fleet. In the absence of a well-supported and clear assessment, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, especially from the underwater noise generated during construction activities. High-energy hammer piling over extended periods is expected to create disturbances across considerable distances, which could affect species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming concerns; yet, the application diminishes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction undermines the reliability of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Furthermore, the assessment fails to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a detailed examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

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

Considering these points collectively, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment flawed and unreliable. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to address the full extent of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are inextricably linked, yet they have been evaluated separately, leading to a fragmented analysis that obscures

the true scale of both environmental and socio-economic effects.

Included among the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The assessment does not comprehensively evaluate these impacts, thus hindering a complete understanding of the project's environmental footprint.

Furthermore, the application's exclusion or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components together, yet the delineation between offshore and onshore elements results in a lack of clarity regarding 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 afforded policy protection. The application fails to demonstrate that a thorough assessment of these habitats has been conducted or that suitable avoidance measures have been instituted, thus revealing a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with existing land use and legal rights. The absence of evidence indicating that the requisite consents or processes have been initiated brings into question the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests is in conflict with both the National Marine Plan and National Planning Framework 4. The lack of evidence supporting the avoidance or mitigation of impacts further undermines the application.

In summary, the segmentation of project components, coupled with the absence of a thorough assessment and insufficient evidence regarding environmental and land use impacts, renders this portion of the application incomplete and unreliable, 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.

TOURISM

The application presents a significant shortfall in the assessment of tourism impacts, neglecting to examine the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or

the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the potential industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or broader economic resilience. This absence of analysis precludes a determination of whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment overlooks the significance of environmental quality in tourism, particularly the need for unspoiled landscapes and dark skies for an enhanced visitor experience. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a major gap in understanding the effects on a recognised and growing segment of the local economy, namely nature-based tourism and astro-tourism.

In an island community with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives identifying tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic reliance result in a considerable evidential void. This gap hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application reiterates the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for this application is incomplete and unreliable. There are significant gaps in the baseline data, and it continues to utilise an undefined design envelope. Moreover, it relies on unspecified mitigation measures and overlooks

essential impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. As such, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

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

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore elements have not been thoroughly assessed, obscuring potential 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 necessary to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and precluding any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or employ relevant regulatory provisions to compel 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: 1EEA2001

Member of the public 1522

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 grounded in a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise from the scale and design of the proposal, particularly regarding its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and crucial elements of the proposal remain undefined. The reliance on a flexible design framework hinders the ability to evaluate likely significant effects, and the unspecified nature of mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Moreover, there are significant conflicts with established policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, compromising the capacity of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned close to the shoreline, raises critical concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and reliable evaluation of the potential environmental impacts of the proposal. The incorporation of a flexible Project Design Envelope, which does not commit to particular turbine sizes, arrangements, or configurations, introduces a substantial level of uncertainty. This approach hampers the ability to apply a consistent worst-case scenario, thereby compromising the assessment's integrity. Consequently, the impacts outlined may not accurately represent the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental consequences.

The application places excessive reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be rectified later prevents a meaningful assessment of the effectiveness of these measures or the evaluation of residual impacts. Deferring critical information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies be clearly defined before any determination is made.

Furthermore, there are considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of potential impacts, especially when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and vulnerable habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it does not convincingly establish that impacts have been thoroughly assessed or that suitable safeguards exist.

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

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in the assessment of seascape, landscape, and visual impacts, which do not adequately capture the scale of change or the sensitivity of the receiving environment. The character of the West Lewis coastline

is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would result in a dominant industrial presence, fundamentally transforming this character and leading to a permanent alteration of the landscape.

Furthermore, the application fails to accurately convey the magnitude of the anticipated visual change. The scale and proximity of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of this impact within such a sensitive landscape.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints considered may not adequately represent the most sensitive receptors or the most severe scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the extent of visual impact has been downplayed, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to evaluate 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 connected by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities, failing to acknowledge 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 vital relationships, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a more profound cultural and spatial detriment that remains inadequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The extent of the proposed changes is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a rigorous worst-case scenario assessment further erodes any assertion 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 overwhelmingly dominant and inescapable. The resultant change is therefore fundamental and permanent, rather than something that could be rendered acceptable through mitigation measures.

In conclusion, the assessment inadequately reflects the magnitude of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage.

These shortcomings preclude a reliable evaluation and underscore the position that the proposal is at odds with the protection of this landscape.

FISHERIES AND MARINE LIFE

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

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

The application further jeopardises marine species, particularly due to the underwater noise expected from construction activities. The high-energy hammer piling proposed is likely to generate disturbances that extend over considerable distances, impacting species such as dolphins. Concerns are particularly raised regarding the predicted effects on a significant portion of the local bottlenose dolphin population. Despite these serious implications, the application downplays these impacts without providing adequate supporting evidence.

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

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

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

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

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it does not quantify how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution from tourism. The assessment of tourism impacts is inadequate and overlooks the economic and social consequences for a vital sector of the Isle of Lewis economy.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Despite this growth, the application fails to analyse how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would bring a net economic benefit or harm an established and expanding sector.

The assessment neglects to evaluate the critical role of environmental quality in sustaining tourism, including the value of unspoiled landscapes and dark skies to the visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impact on a recognised and growing part of the local economy.

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

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

Overall, the failure to quantify the impacts on tourism, evaluate environmental factors influencing visitor behaviour, and consider the island's economic reliance leads to a significant evidential gap. This results in an incomplete application and hinders a thorough evaluation of the economic effects.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns regarding its compliance with sustainable development principles when evaluated against statutory obligations, national policy, and evidential requirements. It mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these critical issues.

There are significant shortcomings in the evidential basis for the application. It lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Key impact pathways, particularly regarding nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects, have been overlooked. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Furthermore, there are evident procedural deficiencies. The absence of a compliant Island Communities Impact Assessment contravenes the statutory duties outlined in the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a material oversight. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural habitats, or cultural heritage. Additionally, it fails to illustrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of offshore and onshore elements have not been adequately assessed, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and barring a lawful conclusion on the acceptability of impacts.

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, the disruption of cultural and visual relationships, and the negative impacts on tourism will have permanent effects that cannot be adequately 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, hinder the ability to make a lawful and evidence-based decision. It is imperative that the competent authority either refuse

consent based on these grounds or invoke the necessary regulatory provisions to mandate the submission of the required information.

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

Additional Comments

As a very proud islander, I would like to strongly object to the proposed Spiorad na Mara offshore wind development off the coast of Lewis.

I completely understand the need for renewable energy, but I honestly feel this development is far too big and would completely change the landscape around our wonderful island. One of the most special things about Lewis is the natural beauty, open sea views and unspoiled coastline. It's part of our identity and way of life growing up here.

I feel like developments on this scale would industrialise the area and spoil the scenery for local people and future generations. Tourism is also such a massive part of the island now, and people come here because of the peacefulness and untouched nature of the place.

There are also worries around the impact on wildlife, marine life and fishing. Once something like this is built, there's no going back.

It sometimes feels like island communities are expected to sacrifice more and more of their landscape while the benefits mostly go elsewhere. Local voices and concerns SHOULD MATTER!!!!!!!

For all of these reasons, I strongly object to the Spiorad na Mara 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: FA91CD96

Member of the public 1523

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. It draws upon a review of the Environmental Impact Assessment Report and the supporting documentation, 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 strong cultural heritage. The scale and design of the project, along with its proximity to the shoreline, raise fundamental questions regarding compliance with statutory requirements, national policy, and the principles of sustainable development.

The documentation submitted fails to present a sufficient evidential foundation for lawful consideration. Essential environmental data is absent, while baseline information appears to be both limited and inconsistent. Additionally, critical elements of the proposal remain undefined, and the flexible design framework inhibits a comprehensive understanding of potential significant effects. The dependence on unspecified mitigation measures renders it impossible to assess their effectiveness, leading to a situation where the documentation does not provide a full or informed understanding of the environmental, cultural, or community impacts. Claims asserting negligible or non-significant effects lack robust evidential support.

There are evident and substantial conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements designed to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly impact the statutory tests necessary for obtaining consent and compromise 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 situated in close proximity to the coastline, raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations underscores that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to 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 adequately assess alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic options based on their environmental effects, it provides a narrative account of the project’s evolution. This lack of a systematic approach means

that less harmful alternatives have not been properly identified or evaluated in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing the turbines further offshore, where the potential visual, ecological, and coastal impacts might be diminished. The sensitivity of the West Lewis coastline underscores the importance of proximity to shore in assessing impact, and the absence of a thorough analysis in this regard hinders the ability to ascertain whether the proposed siting is indeed the least damaging option.

Furthermore, the shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been explored sufficiently to mitigate impacts on sensitive receptors. This includes significant sites of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that the project has not applied mitigation by design, relying instead on measures intended to be implemented post-design.

As a consequence, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This oversight fails to follow the established mitigation hierarchy and prevents the competent authority from determining whether more suitable and less harmful alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and the wellbeing of the community. The failure to provide a structured and comparative assessment is a significant omission that reinforces the overall conclusion that the application has not been sufficiently evaluated and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, which are a European Protected Species. The application neglects to properly recognise and assess their active use of

coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction-related disturbance, noise, and increased activity have not been properly evaluated. As a result, the assessment's conclusions regarding the absence of significant effects on otters are undermined.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the actual presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the application fails to convincingly demonstrate that these species will not be adversely affected. Located within key foraging areas and migratory pathways, the development does not adequately evaluate the implications of potential displacement, collision risks, or habitat loss.

A crucial contradiction arises within the application, wherein the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment

and suggests that the conclusions drawn lack adequate support from the underlying evidence. Furthermore, the assessment does not sufficiently prove that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is underrepresented, and the reliance on modelling methods introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application does not fulfil the evidential standards required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic viewpoint, treating heritage as isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice; however, the assessment erroneously categorises them as static features, ignoring their continued relevance and the implications of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural impacts and overlooks their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, which encompasses the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are fundamental to the identity of the area but are entirely omitted from the assessment, representing a significant oversight. Without acknowledging these elements, it is impossible to fully comprehend the cultural implications of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, recognised as having characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been conducted. This lack of meaningful engagement undermines the legitimacy of the assessment and neglects to reflect established principles regarding participation in decisions that impact cultural and environmental interests.

A critical procedural deficiency is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination unachievable.

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

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report has not been published. This significant evidential gap hinders both public understanding and the ability of the competent authority to grasp the full extent of social risks identified through the developer's research. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative in nature. However, the failure to disclose the complete assessment limits proper scrutiny of the findings and obscures their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own

findings. Unfortunately, these impacts have not been fully incorporated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By failing to provide the complete dataset, the application does not present a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development must facilitate positive health outcomes and mitigate harm. The available evidence suggests existing adverse effects that have not been fully revealed, thus preventing the demonstration of compliance with this policy in the absence of the full assessment.

The procedural implications are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning the seascape, landscape, and visual impacts is significantly lacking, failing to capture the true extent of change and the sensitivity of the environment in question. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous and overwhelming industrial presence, which would drastically alter this character and lead to a permanent and irreversible transformation of the landscape.

Moreover, the application does not adequately reflect the scale of visual change that would ensue. Given their scale and proximity, the turbines would overshadow views from residential areas, historical sites, and popular coastal locations. This situation would detrimentally affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment falls short in conveying the true level of impact and its significance, particularly in such a sensitive landscape.

There are notable methodological shortcomings in the choice and presentation of

visual viewpoints. Evidence indicates that some viewpoints do not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been minimised, thereby compromising the assessment's reliability.

Another critical shortcoming is the neglect to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape context, interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these assets in isolation rather than acknowledging their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This constitutes not only a visual impact but also a wider cultural and spatial detriment, which has not been adequately assessed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of change is inconsistent with the obligation to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy conformity.

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

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 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 lacks the necessary detail to properly assess construction and pollution risks, which is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline, characterised by clean coastal waters and important habitats, is at risk from potential sediment disturbance and contamination. While the application acknowledges hazards such as sediment mobilisation and accidental chemical or oil spills, it fails to outline how these risks will be prevented, controlled, or monitored.

Concerns are heightened by the absence of fully developed Construction

Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are set to be prepared after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness. This deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be evaluated before consent can be granted.

Moreover, there is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive in broader assessments.

The lack of detailed emergency response procedures exacerbates these issues, as the postponement of contingency planning to a post-consent stage hampers the evaluation of whether adequate safeguards are in place to deal with pollution incidents. Consequently, this introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively at the point of determination.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks detail and does not adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, but the application fails to show how these habitats and uses will be protected or maintained without significant disruption.

A key problem is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can handle additional pressure. This is important, as displacement could lead to overfishing in other areas and could negatively affect the local fishing fleet's economy. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to noise generated during construction. The use of high-energy hammer piling for extended periods is expected to cause disturbance over large areas, which could impact species such as dolphins. The anticipated disturbance to a large part of the local bottlenose dolphin population raises serious concerns, yet the application

downplays these effects without enough supporting evidence.

There is also a clear contradiction within the application. While it acknowledges that licenses are needed to permit harm to European Protected Species, it simultaneously claims that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises issues about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application involves significant onshore infrastructure works, including cabling across protected moorland and the construction of a substation near Stornoway, which raises serious concerns. These works are linked to sensitive landscapes and require excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. However, the assessment provided is materially incomplete, failing to consider the full extent of impacts associated with the integrated nature of the project. By assessing offshore turbines and onshore elements separately, the application obscures the true scale of environmental and socio-economic effects.

The exclusion or deferral of onshore impact assessments hinders the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates a comprehensive evaluation of all project components, yet this disjointed approach prevents a full understanding of the combined impacts on peatlands, habitats, and local communities. This is particularly concerning given the risks to sensitive habitats, including machair systems and peatland environments that are under policy protection. There is a clear evidential gap regarding biodiversity protection, as the application does not adequately demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied.

Moreover, the proposal raises pressing issues related to carbon balance. Disturbance

of peatland may release stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy initiatives. The application fails to address this crucial issue adequately or to show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence indicating that the necessary consents or processes have been initiated, raising doubts regarding deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application's reliability. Consequently, the separation of project components, lack of comprehensive assessment, and absence of evidence on environmental and land use impacts render this portion of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is distinguished by exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a material omission. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, risks creating a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the importance of dark skies to the area's identity and emerging tourism sectors, such as astro-tourism. The failure to consider these aspects leads to a noticeable gap in the overall landscape and environmental assessment.

More critically, the absence of any evaluation regarding the effects on nocturnal wildlife cannot be overlooked. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or a phototaxis study, preventing an understanding of how aviation lighting may affect these species or contribute to mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately reflect nocturnal activity or the associated risks. Species such as Kittiwakes, which might forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential impact has

not been addressed. The absence of site-specific night-time data creates a significant deficiency in understanding the ecological impacts.

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

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

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

TOURISM

The evaluation of tourism impacts associated with the proposal is severely lacking and does not adequately address the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's stunning wild coastline, near-pristine landscapes, dark skies, and a distinct sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of the tourism sector.

The significance of tourism has been notable, with revenue increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island’s economy. However, the application does not evaluate how the proposed industrialisation of the seascape and the consequent loss of environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains uncertain whether the development would provide a net economic benefit or potentially harm a sector that is both established and growing.

Moreover, the assessment overlooks the crucial role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and supporting burgeoning markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, resulting in a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In an island community that has limited economic diversification, the negligence in

evaluating tourism impacts has broader ramifications for employment, local businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the combination of inadequate quantification of tourism impacts, insufficient assessment of environmental factors influencing visitor behaviour, and disregard for the island's economic dependence culminates in a significant evidential gap. This prevents a thorough evaluation of the economic effects and supports the argument that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the critical concerns that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not adequately address these priorities.

There are significant gaps in the evidential basis for the proposal, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the application lacks clarity regarding mitigation measures and does not address crucial impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident. The proposal lacks a compliant Island Communities Impact Assessment, violating statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Moreover, the proposal contradicts National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the net economic benefit of the project. Furthermore, the cumulative impacts of both offshore

and onshore components have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The evidential standard required to confidently rule out adverse effects has not been achieved, necessitating the application of the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8D3CC41D

Member of the public 1524

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and associated documents, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The wind farm is proposed to be located off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the proposal centre on its scale, proximity to the shore, and design, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by strong evidence.

There are significant policy conflicts within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal presents additional concerns, with large turbines positioned very close to the shoreline, raising issues of landscape capacity, visual dominance, and environmental impact. Overall, 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 factors, the precautionary principle should be applied.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment involved. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence that would profoundly alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately depict the magnitude of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential properties, historic landmarks, and popular coastal areas. This would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence to suggest that the viewpoints chosen may not fully capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This could lead to an underestimation of the visual impacts, thus compromising the reliability of the assessment.

Another major shortcoming is the lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Notable 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 considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete understanding 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 goes beyond a mere visual impact, representing a more extensive cultural and spatial detriment that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in terms of safeguarding natural environments and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant locations. Furthermore, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The size, height, and proximity of the turbines would create a dominant and unavoidable presence. Consequently, the resulting transformation is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of the construction and pollution risks associated with the proposal is insufficient and lacks the necessary detail to evaluate the potential environmental impacts adequately. The project entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which impedes any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly worrisome due to 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. Although the application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills, it does not provide adequate details on how these incidents will be prevented, controlled, or monitored.

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

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application limits the ability to evaluate whether proper safeguards are in place to manage pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures adequately at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and the absence of such information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty about potential impacts results in a materially

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these uses and habitats can be protected or maintained without major disruption.

One critical concern is the assumption that fishing activities can be displaced without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or can sustain additional pressure. This is a serious oversight, as displacement could lead to overfishing in other areas and could have broader economic implications 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 proposal introduces substantial risks to marine species, particularly due to underwater noise from construction activities. The use of high-energy hammer piling for extended periods is expected to cause disturbances over considerable distances, which could adversely affect species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimises the importance of these impacts without adequate supporting evidence.

Inconsistent statements within the application also raise concerns. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises doubts about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

Additionally, the assessment does not address cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

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 avoid unacceptable impacts on marine biodiversity, thus preventing any determination that the proposal represents sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the

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

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

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

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

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

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

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

In summary, the separation of project components, the lack of comprehensive

assessment, and insufficient evidence on environmental and land use impacts make this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant shortcoming in the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible over extensive distances, creating a continuous "wall of light" effect across the western horizon. This alteration will fundamentally disrupt the night-time environment.

Furthermore, the application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly concerning given the crucial role that dark skies play in the area's identity and in burgeoning sectors like astro-tourism. The failure to consider these impacts leaves a notable gap in the landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, leading to disorientation and a higher risk of collision. The application lacks any lighting impact assessment or phototaxis study, resulting in an oversight of how the proposed aviation lighting may affect these species and potentially increase mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which fails to capture the nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, also face the threat of disorientation from artificial lighting, yet this has not been properly assessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may suffer adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral component of the surroundings.

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

TOURISM

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

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development, as determined by statutory duties, national

policy, and evidential standards. It mirrors the core issues of the 2008 Lewis Wind Power proposal refusal, where the degree of industrialisation was deemed unacceptable. This current application is presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the evidential basis necessary for proper determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of key impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This inadequacy obstructs a full understanding of the likely significant effects and residual impacts of the proposal.

There are also significant procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a comprehensive Social Impact Assessment represents a material omission. These deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

In direct contradiction to National Planning Framework 4, the proposal does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty remains regarding environmental risks, with incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

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

It is therefore 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: 37F1D07A

Member of the public 1525

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 proposal is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and strong cultural identity. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key elements of the proposal remain undefined. The employment of a flexible design framework hinders a clear assessment of likely significant effects, and the proposed mitigation measures, which have not yet been specified, preclude an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

There are significant 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 does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises further concerns, with large turbines positioned in close proximity to the shoreline, leading to significant issues regarding landscape capacity, visual dominance, and environmental impact. In light of the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report exhibits significant deficiencies and fails to deliver a complete, transparent, and dependable account of the likely environmental effects associated with the proposal. The reliance on a flexible Project Design

Envelope, which lacks a commitment to definitive turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty compromises the integrity of the assessment, obscuring the true extent of environmental impacts from both the public and the competent authority, thereby hampering informed decision-making.

Moreover, the application places substantial emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent with the understanding that environmental harm will be rectified later inhibits any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferment of crucial information to stages following consent is procedurally unacceptable and stands in opposition to the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly identified before any determination is made.

Furthermore, the report suffers from serious evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of the impacts, particularly when conclusions regarding 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 and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, as it fails 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 demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as there is no evidence that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application 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 within the West Lewis coastal environment is inadequate, resulting in an unreliable understanding of the ecological receptors present. This coastal area is known for its sensitivity and biological activity; however, the baseline data provided is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant oversight concerns otters, which are classified as a European Protected Species. The application does not appropriately recognise or assess their active use of coastal zones for foraging and movement. By failing to consider their core foraging range and behavioural patterns, the assessment does not adequately evaluate the potential impacts of construction disturbances, noise, and increased activity, thereby undermining any conclusions about the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys has introduced notable detection bias, particularly in challenging Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest frequent use of these waters. The omission of this relevant data leads to an incomplete baseline, further undermining 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 robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the requirements outlined in the Environmental Impact Assessment regime and the National Planning Framework 4. The assessment has not properly identified or evaluated protected species, leading to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. As such, the precautionary principle is engaged, making it unlawful to grant consent in these circumstances.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These deficiencies inhibit a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development contains significant flaws and inconsistencies that undermine its credibility. It fails to provide adequate evidence that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. The area is vital foraging ground and includes key migratory pathways, yet the assessment does not thoroughly analyse potential impacts related to displacement, collision risk, or habitat loss.

Notably, the developer presents contradictory conclusions; while asserting there will be no significant adverse effects, they simultaneously put forward a Habitats Regulations derogation case, which is only necessary when there is an expectation of significant harm. This contradiction raises serious concerns about the assessment's reliability and suggests that its conclusions lack support from the evidence presented.

The methodologies employed in the assessment are questionable, particularly as they appear to underestimate mortality rates, especially for species such as Kittiwakes and Fulmars that are in severe decline. The insufficient evidence regarding seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, is concerning, particularly as the significance of these feeding grounds is not fully

addressed. Furthermore, the use of modelling approaches introduces uncertainty, especially given that baseline data is incomplete and species behaviour is not fully understood.

The location of turbines within a recognised migratory corridor poses an additional risk, as it effectively creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of potential sustained mortality in this corridor are not adequately assessed, nor are the effects on species with relatively small global populations.

Regulatory considerations indicate that the application does not meet the evidential standards required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of inconsistencies, along with gaps in data and limitations in modelling, means that the conclusion has not reached the standard of being beyond reasonable scientific doubt. This situation invokes the precautionary principle and undermines the legitimacy of any consent granted.

Moreover, these deficiencies result in a lack of compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

Collectively, the assessment is marked by internal inconsistency, methodological weaknesses, and a lack of sufficient evidence. These issues hinder a comprehensive evaluation of the potential impacts and affirm that the application does not satisfy the statutory requirements necessary for a positive 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 lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. While the developer engaged with local residents through focus groups, the full report remains unpublished, creating a crucial evidential gap. This absence of information obstructs both public understanding and the competent authority's ability to gauge the extent of social risks identified through the developer’s research.

Preliminary summaries reveal that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These issues stem from direct community engagement and are not based on speculation. Nonetheless, the withholding of the complete assessment restricts thorough scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there is recognition that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the appropriate consideration. By not disclosing the entire

Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency also undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health implications is crucial for developments of this scale. The application fails to present a complete evidential basis necessary for assessing the balance between benefits and potential harm by omitting the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes while minimising harm, yet the available evidence highlights existing adverse effects that remain inadequately disclosed. Without access to the full assessment, demonstrating adherence to this policy is not feasible.

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents a significant deficiency in assessing the impacts on seascape, landscape, and visual aspects, failing to accurately reflect the sensitivity of the environment and the extent of change that would occur. The West Lewis coastline is characterised by an open Atlantic horizon and an undeveloped nature that evokes a strong sense of remoteness. The introduction of large-scale turbines in proximity to the shoreline would establish a continuous industrial presence, drastically altering this character and resulting in a permanent transformation of the landscape.

The visual change anticipated from this application is not adequately represented. The turbines' scale and closeness would dominate views from residential areas, historic sites, and popular coastal locations, which would lead to a direct impact on visual amenity and diminish the defining qualities of naturalness and remoteness. The assessment fails to properly convey the significance of this impact on such a sensitive landscape.

Concerns arise regarding the methods used to select and present visual viewpoints. Evidence suggests that the chosen viewpoints may not capture the perspectives of the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the

visual impact has been understated, which undermines the assessment's reliability.

Furthermore, the assessment neglects the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these assets in isolation, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The proposed industrialisation of the seascape would sever these crucial relationships, changing the context in which heritage assets are perceived and disrupting their connection to the natural horizon. This represents not merely a visual issue but broader cultural and spatial harm that has not been appropriately assessed within the application.

From a policy standpoint, the proposal contradicts the National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The magnitude of the proposed changes does not align with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further questions the claim of compliance with policy.

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

Collectively, these points illustrate that the assessment inadequately represents the true scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is notably incomplete and lacks the necessary detail to evaluate potential environmental effects. It entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is troubling. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, thereby hindering any meaningful assessment of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment

mobilisation and the possibility of chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also affects potential effects on marine species and habitats recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs an evaluation of whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of this information renders a lawful determination impossible. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant inadequacies in the assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters surrounding the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry. However, the application does not adequately prove that these vital habitats and uses can be preserved without considerable disruption.

A major concern lies in the assumption that fishing activities can be relocated without adverse effects. The application lacks evidence to indicate that alternative fishing grounds exist, are accessible, or can endure increased pressure. This gap is crucial, as displacing fishing can lead to overfishing in other areas and could have broader economic ramifications for the local fishing community. In the absence of a well-founded assessment, the potential consequences for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during the construction phase. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across considerable distances, impacting species such as dolphins. Concerns regarding the predicted disturbance to a substantial portion of the local bottlenose dolphin population are serious, yet the application downplays these impacts, lacking adequate supporting evidence.

There is also a troubling inconsistency within the application itself; while it acknowledges the necessity for licences to inflict harm on European Protected Species, it simultaneously describes the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions about its adherence to the Habitats Regulations, especially where anticipated harm would require legal authorisation.

Furthermore, the assessment neglects to account for cumulative impacts arising from various pressures, such as 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 accurately assessed.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which hinders any conclusion about the proposal's sustainability.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure associated with this project is fundamentally lacking and does not take into account the full range of impacts resulting from what constitutes a single integrated development. The offshore turbines and the onshore works are inherently interconnected; however, they are evaluated in isolation, leading to a disjointed approach that conceals the true magnitude of environmental and socio-economic consequences.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure traversing sensitive landscapes. These activities necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon reserve and is an ecologically sensitive environment. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be examined collectively; yet the disjunction of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Moreover, the proposal raises substantial concerns regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that runs counter to the goals of renewable energy initiatives. The application does not sufficiently address this concern or confirm that the overall carbon balance is favourable.

There are notable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy measures. The application does not establish that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance strategies have been implemented. This reveals a significant evidential gap in terms of biodiversity protection.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land uses and legal entitlements. The application lacks evidence that the requisite consents or procedures have been initiated, raising doubts about the feasibility and lawful execution of the project.

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

In conclusion, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts culminate in a submission that is incomplete and unreliable, thereby preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any consideration of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposed development would install permanent red aviation lighting that would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to the developing sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these factors highlights a clear

gap in the overall assessment of landscape and environmental impacts.

Furthermore, the proposal does not address the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the associated mortality risk, have not been evaluated.

Compounding this issue, the ornithological assessment relies solely on daytime survey data, failing to account for nocturnal activity and related risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data results in a critical deficiency in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission contradicts the aims of National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also detracts from the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the ecosystem.

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

TOURISM

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

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

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

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

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

In summary, the shortcomings in quantifying tourism impacts, the neglect to assess the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the critical concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not adequately address these issues.

There are significant deficiencies in the evidential basis required for determination. The application lacks comprehensive baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and the potential tourism effects. As a result, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands

(Scotland) Act 2018. Moreover, the incomplete disclosure of the 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 failures render the application unsuitable for determination.

The proposal conflicts directly with the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural habitats, or cultural heritage. Additionally, it fails to provide evidence of acceptable health and wellbeing impacts and lacks tourism impact modelling necessary to substantiate any net economic benefit. The assessment of cumulative impacts, both offshore and onshore, has not been adequately conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal are uncertain and could be significant. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism represent lasting impacts that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The considerable information gaps, alongside policy inconsistencies and unresolved environmental risks, hinder the ability to reach a lawful and evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or require the submission of the missing information.

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

Additional Comments

I don’t overall object to development, the island communities are in great need of investment and so on. However I find issue with the scale of the current proposals, the health impacts on local communities (recent research papers published in 2026 on infrasound impacts from turbines) and the benefits that are likely to flow into the islands from the development have been poorly negotiated / communicated.

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: 61712A50

Member of the public 1526

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

Dear Sir/Madam

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

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

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

The unprecedented scale of this proposal introduces large turbines in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Overall, the combination of inadequate information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on an undefined design envelope and the absence of specified mitigation measures critically undermine the Environmental Impact Assessment Report. This report is materially deficient, failing to provide a comprehensive, transparent, or reliable account of the potential environmental effects associated with the proposal. By introducing significant uncertainty, the flexible Project Design Envelope prevents a consistent application of a worst-case scenario, which raises concerns about the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect what will be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Furthermore, the application seeks consent based on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach defers essential information to post-consent stages, obstructing a meaningful evaluation of their effectiveness or the assessment of residual impacts. Such procedural shortcomings conflict with the purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation measures be established clearly before any determination can take place.

There are notable evidential deficiencies present, including gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory requirements.

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

In summary, the Environmental Impact Assessment Report's deficiencies—including its reliance on an unspecified design envelope, the lack of defined mitigation measures, and gaps in baseline data—render it unreliable and incomplete. These flaws hinder a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make a well-informed decision 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 several deficiencies that significantly undermine its conclusions. The assessment fails to convincingly demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are in decline, will not be adversely affected by the proposed development. This area includes key foraging zones and migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss are not

adequately evaluated.

There is a fundamental contradiction in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment, suggesting that the conclusions drawn are not backed by sound evidence. Furthermore, the assessment does not provide adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to account for the critical importance of these feeding grounds, and the use of modelling techniques introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies applied may underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not fully understood.

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

Regulatory standards are not met, as the application fails to provide the necessary evidence to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and prevents a lawful conclusion that would support consent.

Collectively, these deficiencies signify a lack of 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 negatively impacted puts the proposal at odds with national policy. Overall, the assessment is unreliable due to internal inconsistencies, methodological flaws, and insufficient evidence, which hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage in relation to the proposed development is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual roles that heritage plays, the application reduces it to a collection of isolated, static assets.

A significant issue arises from the inadequate treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as

active places of burial and spiritual practice, yet the assessment categorises them as static features without considering their continued use and meaning, as well as the development's potential impact on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their significance in community life.

Moreover, there is a failure to take into account intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are conspicuously absent from the assessment, representing a critical oversight. Without incorporating these factors, it is impossible to adequately grasp the cultural ramifications of the development.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, with traits recognised as characteristic of Indigenous Peoples. However, no process of Free, Prior and Informed Consent has been executed. This lack of genuine engagement undermines the credibility of the assessment and disregards established principles of participation in decisions that affect cultural and environmental interests.

A major procedural flaw is the omission of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and sites. The failure to consider both tangible and intangible heritage, alongside the disregard for living cultural practices, signifies a clear deviation from policy mandates.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities culminates in a significant evidential gap. The cultural implications of the development have not been thoroughly evaluated, and the application fails to provide an adequate foundation for understanding the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of transparency results in a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer’s own research. Available summaries highlight that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement, indicating that

they are based on lived experiences rather than speculation. Yet, without access to the complete assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

There is also documented evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own research. Nonetheless, these concerns have not been adequately integrated into the main application or given appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, which 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 the character and functioning of the community may be at risk. The application does not provide the full dataset needed to accurately assess the balance between benefits and harm, failing to meet the evidential standards required.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, existing evidence points to adverse effects that have not been disclosed in full. Without access to the entire assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse effects, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination, reinforcing 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 profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous and overwhelming industrial presence, which would fundamentally alter this character and lead to a permanent and irreversible 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 scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

There are significant methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment. Additionally, the assessment does not adequately evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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 represents not only a visual impact but also a more extensive cultural and spatial harm that has not been sufficiently assessed within the application. From a policy standpoint, the proposal conflicts directly with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any claims 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. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation measures. In conclusion, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies regarding the assessment of construction and pollution risks, which ultimately undermines the ability to properly evaluate potential environmental impacts. The application involves considerable seabed preparation and installation works in a dynamic Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be developed after consent, obstructing any meaningful appraisal of their potential effectiveness.

This approach is particularly troubling given the ecological sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to both sediment disturbance and contamination. While

the application does acknowledge risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring strategies.

Moreover, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without reliable modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these disturbances. This uncertainty also extends to the possible effects on already identified sensitive marine species and habitats within the broader assessment framework.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application hampers the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This not only introduces procedural risks but also weakens the capacity of the competent authority to assess 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 before consent is granted; without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy mandates regarding environmental protection and water quality.

Collectively, the absence of specific mitigation measures, the failure to present detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding the assessment of fisheries and marine life, which is inadequate and does not deliver a thorough evaluation of ecological or socio-economic impacts. The area off the West Lewis coast is home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not sufficiently demonstrate that these critical habitats and uses can be preserved or maintained without considerable disruption.

A notable issue is the presumption that fishing activities can be displaced without adverse effects. The application lacks any evidence indicating the availability, accessibility, or capacity of alternative fishing grounds to accommodate additional pressure. This gap is critical, as such displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-backed assessment, understanding the implications for fisheries and local livelihoods remains elusive.

Moreover, the proposed development poses considerable risks to marine species, especially due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged duration is expected to create disturbances over extensive distances, impacting species such as dolphins. The predicted effects on a notable portion of the local bottlenose dolphin population raise significant issues, yet the application tends to underestimate these impacts without adequate supporting evidence.

Inconsistencies are evident within the application itself, where it acknowledges the necessity of licences to allow harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially when harm is anticipated to a degree that mandates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic 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 compliance with National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal constitutes sustainable development.

When viewed collectively, the deficiencies in the assessment regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the evaluation incomplete and unreliable. These shortcomings hinder a thorough assessment of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

In an island community characterised by limited economic diversification, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated by the Islands (Scotland) Act 2018.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

Additional Comments

I object to this proposal for a number of reasons.

1. Tourism is my job and we rely on a naturally beautiful Island to attract visitors. Windfarms especially ones on this scale put people off visiting wild, untouched places.

2. The Island doesnt have the infrastructure to support all the workers who would have to come up here. The ferries, planes, NHS all struggle with demand as it is.

3. No benefit to the island in terms of profits or cheap electricity.

4. Onshore work that hasn't yet been finalised will also be hugely disruptive and damaging to the local landscapes.

5. Proximity to land. Why are they so close to shore!?

6. Damage to wildlife.

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: 68623350

Member of the public 1527

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals numerous material deficiencies across planning, environmental, cultural, and procedural areas. This development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline and rich cultural identity. The proposal's scale, design, and proximity to the shoreline pose significant compatibility concerns with existing statutory requirements, national policy, and sustainable development principles.

The application is severely lacking an adequate evidential basis necessary for lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many aspects of the proposal remain undefined, complicating the assessment of likely significant effects. The reliance on an unspecified flexible design framework, along with unarticulated mitigation measures, means that the effectiveness of these measures cannot be adequately assessed. Consequently, the documents fail to facilitate a full understanding of potential environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsubstantiated by robust evidence.

There are substantial conflicts with established policy. The proposal demonstrates inconsistency with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and overall health and wellbeing. It does not satisfactorily show that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These issues fundamentally challenge the statutory tests necessary for consent and hinder the competent authority's capacity to determine the development's acceptability in policy terms.

The scale of this proposal is unprecedented for this location, with large turbines situated near the shoreline, raising serious concerns related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the application must adhere to the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks commitments to specific turbine dimensions, layouts, or configurations, generates substantial uncertainty and hinders the consistent application of a worst-case scenario. This issue undermines the integrity of the assessment and obscures the true extent of environmental effects from both the public and the competent authority.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have not been adequately defined. As such, consent is being sought with the expectation that any environmental harm will be addressed at a later stage. This approach obstructs meaningful evaluations of effectiveness and an assessment of residual impacts. The deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly identified prior to determination.

Significant evidential deficiencies are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This results in uncertainties about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

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

In conclusion, 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 shortcomings obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot determine the application based on the information that has been provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured, reasoned comparison of realistic alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of presenting a comprehensive analysis based on environmental effects, it offers a narrative account of how the project has evolved. This approach does not adequately demonstrate that less harmful alternatives have been

identified, assessed, and preferred over more damaging solutions.

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

The shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been considered, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not adequately show that environmental harm has been minimised through the selection of site, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which is essential for the competent authority to assess whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it is not possible to conclude that the proposal is sustainable or compliant with policy.

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the overall 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 presents significant shortcomings, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal area. This environment is both highly sensitive and biologically active, yet the data on existing conditions is insufficient, and the methodologies used do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A notable gap in the analysis pertains to otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active usage of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural patterns means that the potential impacts stemming from construction disturbance, noise, and increased activity remain inadequately assessed. This significant omission casts doubt on any conclusions drawn regarding

the absence of noteworthy effects on this species.

There are also considerable flaws in the assessment of basking sharks, as the reliance on aerial surveys introduces a substantial bias in detection, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are frequented by such species. The failure to incorporate or give proper consideration to this data leads to an incomplete baseline, further undermining the reliability of the conclusions made.

The limitations in methodology result in conclusions of negligible or non-significant effects being based on assumptions rather than rigorous evidence. The lack of adequate baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the true extent of risk to marine species and their habitats.

From a regulatory standpoint, the application does not align with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not correctly identified or assessed protected species. The degree of uncertainty raised prevents the elimination of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an assessment that is unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine ecology and protected species, culminating in the overall determination that the application lacks a credible evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application is situated within key foraging areas and migratory pathways crucial for internationally important seabird populations along the west coast of the Isle of Lewis, many of which are in decline. However, the ornithological assessment fails to provide sufficient evidence demonstrating that these species will not be adversely affected. The evaluation does not adequately address the implications of displacement, collision risk, or habitat loss, which raises significant concerns.

There exists a fundamental contradiction within the application. The developer concludes that there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected.

The significance of these feeding grounds is not thoroughly recognised, and the reliance on modelling approaches generates uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

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

Moreover, the deficiencies highlighted constitute a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies obstruct a thorough evaluation of impacts and support the conclusion that the application does not meet the statutory requirements for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development lacks necessary transparency, leading to a materially deficient evaluation. Although the developer commissioned a Social Impact Assessment that involved focus groups with local residents, the full report remains unpublished. This situation creates a significant evidential gap, which restricts both public insight and the competent authority's ability to fully comprehend the extent of the social risks identified by the developer’s research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed project. These impacts stem from direct engagement and are therefore grounded in reality, not mere speculation. The inability to disclose the complete assessment inhibits proper examination of the findings and limits the capability to evaluate their significance in the decision-making process.

Furthermore, the proposal appears to threaten community identity and cohesion, with

“cultural loss” highlighted in the developer’s findings. Despite this recognition, such impacts have not been adequately integrated into the main application or considered with the seriousness they warrant. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs that the development may impose.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. The failure to provide the full dataset means the application does not offer a comprehensive evidential basis necessary to assess the balance between potential benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence available suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it cannot be shown that compliance with this policy is met.

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

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of current adverse impacts, renders the overall assessment incomplete and unreliable. This scenario obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment involved. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence that would profoundly alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately depict the magnitude of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential properties, historic landmarks, and popular coastal areas. This would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence to suggest that the viewpoints chosen may not fully capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This could lead to an underestimation of the visual impacts, thus compromising the reliability of the assessment.

Another major shortcoming is the lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Notable 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 considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete understanding 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 goes beyond a mere visual impact, representing a more extensive cultural and spatial detriment that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in terms of safeguarding natural environments and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant locations. Furthermore, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The size, height, and proximity of the turbines would create a dominant and unavoidable presence. Consequently, the resulting transformation is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks critical detail in its assessment of construction and pollution risks, which is essential for evaluating potential environmental effects. With substantial seabed preparation and installation works planned for a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. Instead, the application relies on mitigation and contingency measures that are set to be prepared after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

The reliance on undefined future measures raises particular concerns given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures for these incidents.

Moreover, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty is extended to potential effects on marine species and habitats already identified as sensitive in the broader assessment.

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

From a regulatory viewpoint, the deferral of crucial environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent, and a lawful determination cannot be made in the absence of such information. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty concerning potential impacts collectively render the assessment materially deficient. These failings prevent a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes a development that presents substantial risks to marine species and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing sector. However, the assessment of fisheries and marine life is insufficient, lacking a robust evaluation of both ecological and socio-economic impacts. Notably, the application does not adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

A significant concern arises from the assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that

alternative fishing grounds are available, accessible, or capable of supporting increased pressure from displaced activities. This oversight is critical, as it poses a risk of overfishing in other areas and could lead to wider economic repercussions for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposed development introduces considerable risks to marine species, particularly through the underwater noise produced during construction activities. The use of high-energy hammer piling over an extended period is likely to disturb marine life across extensive areas, with potential effects on species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. However, the application tends to downplay the significance of these impacts, lacking sufficient supporting evidence.

There is an evident inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding compliance with the Habitats Regulations, particularly where anticipated harm may require legal authorisation.

Additionally, the assessment does not account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions remains unattainable.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough assessment of the onshore infrastructure, which is crucial in understanding the full scope of impacts stemming from what constitutes a singular integrated project. The offshore turbines and the onshore components are inherently interconnected; however, their separate evaluations lead to a disjointed analysis that obscures the comprehensive environmental and socio-economic repercussions.

The elements of the onshore works comprise cabling across areas of protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure traversing sensitive landscapes. These activities entail excavation in regions of deep peat, particularly within Barvas Moor, recognised as a significant carbon reservoir and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, which impedes a complete understanding of the environmental footprint of the project.

The assessment deficiencies extend to cumulative effects, as the exclusion or postponement of onshore impact evaluations obstructs an accurate appraisal of overall consequences. The Environmental Impact Assessment process mandates that all project components be evaluated collectively; thus, the fragmented analysis of offshore and onshore elements results in an incomplete understanding of the collective impacts on peatlands, habitats, and local communities.

Additionally, there are notable risks associated with sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not sufficiently establish that the impacts on these vital habitats have been fully evaluated or that suitable avoidance measures are in place. This creates a substantial evidential gap in relation to biodiversity protection.

Concerns also arise regarding carbon balance, as disturbance of peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts renewable energy development objectives. The application inadequately addresses this critical issue or demonstrates that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land further complicates matters, introducing potential conflicts with existing land use and legal rights. The application does not furnish evidence that the requisite consents or processes have been initiated, thereby raising concerns about the project's deliverability and lawful execution.

From a policy standpoint, the division of project assessments and the failure to demonstrate adequate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fundamentally alters the night-time environment along the West Lewis coastline, introducing permanent red aviation lighting that creates a continuous and intrusive "wall of light" effect across the western horizon. This significant change not

only impacts visual amenity but also poses a severe risk to the area's cultural identity and tourism value, particularly in light of the emerging astro-tourism sector, which thrives on the exceptionally dark skies that characterise this region. The application fails to assess how this new lighting affects landscape character or the experience of both residents and visitors, leaving a critical gap in the environmental assessment.

Moreover, the absence of an evaluation concerning the impacts on nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting due to phototaxis. The proposal neglects to include any form of lighting impact assessment or phototaxis study, thus failing to evaluate how the aviation lighting might increase the risk of disorientation and collision for these species. This omission is further exacerbated by a reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from such lighting, yet this risk has not been addressed.

The lack of site-specific night-time data creates an essential void in understanding the ecological impacts, preventing a determination of whether protected species or designated sites could be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unmet, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this glaring omission contradicts the National Planning Framework 4, which underscores the importance of protecting natural places and ensuring environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

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

TOURISM

The evaluation of tourism impacts presented in the application is severely lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The region's tourism is intrinsically linked to its natural assets, which include the wild coastline, near-pristine landscapes, dark skies, and a 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 might influence visitor numbers, behaviours, or the overall economic contribution derived from tourism.

Tourism on the Isle of Lewis has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and accounting for up to 16%

of the island's economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and environmental degradation on Tourism Gross Value Added, as well as on broader economic resilience. The lack of such analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment disregards the critical role of environmental quality in bolstering tourism, particularly the significance of unspoiled landscapes and dark skies in shaping visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and expanding component of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate tourism impacts bears wider implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been appropriately considered, contrary to the requirements set forth by the Islands (Scotland) Act 2018.

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

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and recognising the island's economic dependencies culminate in a considerable evidential gap. This hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development when evaluated against statutory duties and national policy. The concerns raised are similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, while submitted under a more robust policy framework, still lacks necessary considerations for biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It fails to provide reliable baseline data, relies on an undefined design envelope, and does not specify its mitigation measures. Critical pathways of impact, including effects on nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. This renders the Environmental Impact Assessment incomplete, hindering an understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment constitutes a serious omission. These failures hinder a proper assessment of impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts the National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural spaces, and cultural heritage. Additionally, it fails to show acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been assessed appropriately, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals raise concerns. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. The competent authority must refuse consent or require the submission of the missing information.

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

Additional Comments

I am for green energy. I am not against wind turbines in the right circumstances.
The potential negative impact of this development is colossal.
It is too big, too destructive and for the benefit of people far away who will not have to live with its effects.
I do not believe that this is the most effective or least destructive way to generate green energy. I believe this is about profit.
Between new health studies coming to light, conflicting reports and huge controversy this project needs to be halted and reevaluated.

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: 5FDDF237

Member of the public 1528

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 appropriate marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report alongside other supporting documents, revealing significant deficiencies relating to planning, environmental aspects, cultural considerations, and procedural adherence. 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 robust cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with existing statutory requirements, national policies, and the tenets of sustainable development.

The application does not furnish an adequate evidential basis necessary for a lawful determination. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent, with several key elements of the proposal remaining undefined. The application's use of a flexible design framework obfuscates the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects due to a lack of robust supporting evidence.

There exist clear and significant conflicts with policy. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that the national requirements for safeguarding biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly challenge the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines situated in close proximity to the shoreline, which raises substantial concerns regarding the landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species in the West Lewis coastal environment is significantly flawed and does not deliver a thorough or dependable understanding of ecological receptors in this biologically active marine system. The baseline data is notably incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to offer a solid evidential foundation for evaluating potential impacts.

A crucial oversight in the application is the treatment of otters, a European Protected Species. The active use of coastal areas by otters for foraging and movement has not been recognised or properly assessed. This disregard for their core foraging range and behavioural patterns means that the possible effects of construction disturbances, noise, and increased activity have not been thoroughly evaluated. This gap undermines any conclusions regarding the absence of significant effects on the species.

Further weaknesses are evident in the evaluation of basking sharks, where reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in comparison to established land-based observations that indicate frequent utilisation of these waters. The failure to incorporate or adequately consider such information results in an incomplete baseline, thus diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to findings of negligible or non-significant effects being based on assumptions rather than on sound evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the genuine level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it has not correctly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted is deeply flawed and presents critical gaps in evidence that raise serious concerns about its validity. Located in key foraging areas and migratory pathways, the site of the proposed development has significant implications for

internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing declines. Alarmingly, the application fails to provide the necessary evidence that these vulnerable species will not be adversely affected.

A troubling contradiction arises within the application itself, wherein the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case. Such a case is typically only put forward when significant harm is anticipated, which casts doubt on the overall reliability of the assessment and suggests that its conclusions are not adequately supported by the evidence provided. Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected areas, including the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds has not been sufficiently recognised, and the reliance on modelling techniques introduces considerable uncertainty, particularly for species such as Kittiwakes and Fulmars that are in steep decline.

The siting of turbines within an established migratory corridor presents additional risks, effectively serving as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. There is a notable lack of thorough evaluation regarding the long-term effects of sustained mortality in this corridor, particularly concerning species with smaller global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations of the modelling, indicates that the assessment has not reached the standard of beyond reasonable scientific doubt. This situation activates the precautionary principle and hinders a lawful conclusion that could support consent.

Additionally, the identified deficiencies illustrate a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the conservation of natural assets. The inability to adequately demonstrate that internationally important seabird populations will remain unaffected puts the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline should be recognised as a living cultural landscape where environment, language, tradition, and community are interwoven. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It

adopts a reductive approach by treating heritage as isolated, static assets, ignoring their ongoing social, cultural, and spiritual functions within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. Nonetheless, these locations have been mischaracterised as static features, with the assessment failing to consider their continued use and the development's impact on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language and traditions, along with the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the evaluation, representing a significant gap. Without incorporating these factors, the true cultural impact of the development cannot be adequately understood.

The absence of meaningful engagement with the Gaelic-speaking population, who possess a distinct cultural identity and characteristics of an Indigenous People, raises serious concerns about community rights. No process of Free, Prior and Informed Consent has been undertaken, undermining the legitimacy of the assessment and violating established principles of participation regarding decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination of the application.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear breach of policy requirements.

Collectively, these failures to assess living heritage, intangible cultural value, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment, commissioned by the developer, has not been published, resulting in a significant evidential gap. This omission hampers both public understanding and the competent authority's ability to grasp the extent of

social risks identified by the developer's own research. Available summaries suggest that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with residents and are not speculative in nature. However, the lack of a complete assessment hinders proper scrutiny of these findings and limits the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with findings from the developer highlighting concerns over "cultural loss." Despite this recognition, these social impacts have not been adequately integrated into the main application nor given the weight they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the entire Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning are at risk. By not providing the comprehensive dataset, the application fails to present a complete evidential basis to assess the balance between benefits and harms.

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 mitigate harm; however, the evidence currently 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 of this non-disclosure are profound. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and confirms that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, landscape, and seascape impacts is significantly lacking and does not sufficiently address the scale of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an unobstructed Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposal to install large-scale turbines in close proximity to the shore would establish a continuous and prominent industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of

the landscape.

The application inadequately conveys the extent of the visual changes that would occur. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would detrimentally affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment fails to adequately express the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that the viewpoints chosen may not represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and landscapes of high value. This raises the possibility that the scale of visual impact has been downplayed, which undermines the credibility of the assessment.

Moreover, there is a significant shortcoming in the assessment's failure to analyse the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, resulting in a deficient evaluation of their impact and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are appreciated and breaking their connection to the natural horizon. This represents not only a visual concern but also a deeper cultural and spatial detriment that the application has not sufficiently addressed.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The extent of change proposed is incompatible with the imperative to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case analysis further challenges any assertions of policy conformity.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be prominent and inescapable. Thus, the resulting changes are fundamentally permanent, rather than reducible to an acceptable level through mitigation measures.

In summary, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not aligned with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to adequately evaluate the likely environmental impacts. The proposed development entails extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, which inhibits a meaningful evaluation of their sufficiency or effectiveness.

This reliance on undefined measures is particularly alarming considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disruption and pollution. While the application acknowledges the risks associated with sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are established to address pollution incidents. This creates procedural risks and diminishes 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 contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot occur. Additionally, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of comprehensive management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies hinder a robust evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the current application does not adequately protect

these vital habitats or activities, nor does it provide a thorough assessment of the ecological and socio-economic impacts.

A major concern is the assumption that fishing can be relocated without any negative effects. The application lacks evidence showing that alternative fishing grounds are available and can handle additional strain. This is a crucial gap, as displacing fishing activities could lead to overfishing in other areas and harm the local fishing economy. Without a solid, evidence-based evaluation, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposed development also poses serious risks to marine life, especially due to the underwater noise produced during construction. Extended periods of high-energy hammer piling are expected to disturb marine species over large distances, particularly dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is troubling. However, the application tends to minimise the importance of these disturbances without adequate supporting evidence.

There exists a clear contradiction within the application regarding the need for licenses to harm European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially when anticipated harm might necessitate legal permissions.

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

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It falls short of demonstrating that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any conclusion regarding its sustainability.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally incomplete, failing to recognise the interconnected nature of the offshore turbines and the onshore works. These components are assessed independently, leading to a fragmented evaluation that conceals the true extent of environmental and socio-economic consequences.

The onshore project includes the construction of a substation near Stornoway, cabling

across protected moorland, and additional access infrastructure through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts means that the overall environmental footprint of the project remains unclear.

By neglecting the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated together; however, the distinction between offshore and onshore elements prevents a full understanding of the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application falls short in addressing this issue and fails to establish that the overall carbon balance remains favourable.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission in the Environmental Impact Assessment. The coastline of West Lewis features exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive light effect across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important as dark skies play a critical role in the area's identity and the growth of sectors like astro-tourism. The absence of this analysis creates a clear gap in the overall landscape and environmental assessment.

Moreover, impacts on nocturnal wildlife have not been evaluated. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The application fails to include any assessment of lighting impacts or phototaxis studies, meaning the potential effects on these species and the risk of increased mortality remain unexamined.

This issue is further complicated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

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

From a policy standpoint, this omission goes against National Planning Framework 4 concerning the protection of natural places and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time is an essential part of the environment.

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

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it fails to provide a quantified analysis of how large-scale offshore infrastructure could potentially affect visitor numbers, their behaviour, or the overall economic contribution of tourism, which is a key sector of the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this, the application does not model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the community.

The assessment neglects to address the crucial role that environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies cannot be overstated, especially in relation to visitor experience and emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on these important aspects of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the obligation to provide evidence of net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for competent authorities to assess the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious shortcoming in meeting the requirements for sustainable development, as judged against statutory obligations, national policy, and evidential standards. The application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This time, it is put forward under a more stringent policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Crucially, the application lacks a complete and reliable evidential basis necessary for determination. There are significant gaps in baseline data, an unspecified design envelope, and mitigation measures that are not clearly defined. Additionally, it omits vital impact pathways, including those relating to nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a full understanding of potential significant effects or residual impacts.

Moreover, there are significant procedural failings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a material omission. These shortcomings hinder the competent

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

The proposal contravenes the National Planning Framework 4 by failing to protect biodiversity, natural areas, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it show a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C454228E

Member of the public 1529

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, which highlight significant deficiencies across planning, environmental, cultural, and procedural dimensions. The wind farm is planned off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The design, proximity, and overall scale of the proposal raise critical questions about its compliance with statutory obligations, national policy frameworks, and the core principles of sustainable development.

A fundamental issue with the application is the inadequate evidential basis for reaching a lawful determination. Important environmental data is absent, baseline information appears limited and inconsistent, and several key elements of the proposal remain vague. The flexible design framework employed complicates an accurate assessment of potential significant effects. Furthermore, the documentation relies on unspecified mitigation measures, which hinders the ability to evaluate their effectiveness. Consequently, it does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leaving the claims of negligible or non-significant effects unsupported by solid evidence.

The proposal encounters notable policy conflicts. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and overall health and wellbeing. The application fails to prove that it meets national criteria aimed at protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies impact the statutory tests needed for consent and challenge the competent authority's ability to determine the proposal's acceptability in terms of policy.

Moreover, the unprecedented scale of the development in this area raises substantial concerns about its landscape capacity, visual impact, and environmental repercussions, especially with large turbines situated close to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is insufficient and unable to support a lawful determination. In light of these factors, adherence to the precautionary principle is essential.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the social impacts, health, and wellbeing assessment is deeply concerning and fundamentally undermines the evaluation

process. Although a Social Impact Assessment was commissioned by the developer, which included engagement with local residents, the complete report has not been made available. This significant gap in evidence means that both the public and the competent authority are unable to grasp the full extent of the social risks that the developer's own research has identified.

Residents have reported experiencing significant stress, anxiety, and concern as a result of the scale and proximity of the proposal, and these impacts stem from direct engagement rather than speculation. The inability to access the full assessment limits the opportunity for proper scrutiny of these findings, impeding the ability to evaluate their significance in the decision-making process.

There is also a clear perception that the proposal threatens community identity and cohesion, with indications of potential "cultural loss" noted in the developer's findings. Despite this, these critical impacts have not been adequately integrated into the main application or weighted appropriately. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this nature, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not offer a comprehensive evidential foundation needed to assess the balance between benefits and harm effectively.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy becomes impossible.

The procedural implications of this situation are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This lack of sufficient information ultimately hinders a lawful determination regarding the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted regarding seascape, landscape, and visual impacts is lacking in material detail and does not adequately consider the extent of change or the

sensitivity of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed installation of large-scale turbines in proximity to the shoreline would introduce an overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

There is a concerning inadequacy in how the application represents the scale of visual change. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately express the significance of this impact within the context of such a vulnerable landscape.

Moreover, there are methodological issues regarding the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, especially concerning vital cultural heritage sites and high-value landscapes. This raises the concern that the magnitude of visual impact has been understated, compromising 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 exist within a broader landscape context interlinked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities 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 connections, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This represents not merely a visual impact but also a more extensive cultural and spatial detriment that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is incompatible with the imperative to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a thorough worst-case assessment further undermines any assertion of policy adherence.

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

In summary, the assessment fails to accurately capture the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage.

These deficiencies hinder a dependable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and significant habitats that are at risk of sediment disturbance and contamination. The assessment of construction and pollution risks presented in the application is deficient, lacking the necessary detail to adequately evaluate potential environmental effects. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment. However, it fails to include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent is granted, which precludes any substantial assessment of their adequacy or effectiveness.

The application acknowledges the risks of sediment mobilisation and the possibility of accidental chemical or oil spills, yet it does not sufficiently explain how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a stage following consent, the application obstructs the evaluation of whether suitable safeguards are established to manage pollution events. This introduces procedural risks and hampers the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to granting consent, and the absence of such information renders a lawful determination unfeasible. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in a materially deficient assessment. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry, yet the application inadequately assesses the ecological and socio-economic impacts associated with the proposed development. The failure to protect or maintain these vital habitats raises significant concerns regarding potential disruption.

A critical issue lies in the assumption that fishing activities may be displaced without consequence. The lack of evidence regarding the availability, accessibility, or capability of alternative fishing grounds to absorb additional pressure is particularly troubling. This gap in the assessment raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. The absence of a clear, evidence-based analysis inhibits an understanding of the true impacts on fisheries and local livelihoods.

Furthermore, the proposal presents considerable risks to marine species, notably due to the underwater noise generated during construction activities. The use of high-energy hammer piling for prolonged periods is expected to cause disturbances across extensive areas, adversely affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Additionally, there exists a contradictory stance within the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously characterising these impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly in light of anticipated harm that warrants legal authorisation.

The assessment further neglects to address cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, the overall ramifications for marine ecosystems and socio-economic conditions remain indeterminate.

From a policy standpoint, the application fails to demonstrate adherence to 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 avoid unacceptable repercussions on marine biodiversity, thus obstructing any conclusion that the proposal embodies sustainable development.

In summary, the deficiencies in the evaluation regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings inhibit a comprehensive understanding of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant deficiencies in the assessment of onshore infrastructure, which is essential to understanding the entire project's impacts. The offshore turbines and onshore works are interconnected; however, they are evaluated in isolation. This fragmented assessment obscures the complete picture of both environmental and socio-economic effects.

Onshore activities include installing cabling across protected moorland and constructing a substation near Stornoway. These developments require access infrastructure through sensitive landscapes and involve excavation in areas of deep peat, especially within Barvas Moor, a crucial carbon store and ecologically delicate habitat. The lack of a thorough assessment regarding these impacts limits the understanding of the project's overall environmental footprint.

By deferring the evaluation of onshore impacts, the application hinders a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components must be considered collectively. The division between offshore and onshore aspects prevents a complete understanding of the combined effects on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland areas, which are protected by policy. The proposal fails to show that these habitats have been fully assessed, or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Moreover, the project raises issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The proposal does not satisfactorily address this concern or prove that the overall carbon balance is advantageous.

Routing infrastructure through active croft land may also conflict with established land use and legal rights. The application lacks evidence that necessary consents have been obtained or that proper processes are underway, thus calling into question the feasibility and legality of the implementation.

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

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

TOURISM

The application presents a concerning deficiency in assessing tourism impacts, crucial for the economy of the Isle of Lewis. With tourism significantly reliant on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness, the application acknowledges that 86% of visitors are attracted by the scenery. However, it fails to provide any quantified assessment of how large-scale offshore infrastructure could alter visitor numbers, behaviours, or the economic contributions made by this sector.

Tourism has seen substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this, there is no modelling to examine how the potential industrialisation of the seascape and subsequent loss of environmental quality might affect Tourism Gross Value Added or the overall economic resilience of the area. This lack of analysis renders it impossible to ascertain if the proposed development would result in a net economic benefit or detriment to a crucial and expanding sector.

Furthermore, the assessment neglects to address the critical role that environmental quality plays in tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the effects on a recognised and burgeoning segment of the local economy.

Given the limited economic diversification within the island community, the neglect to assess tourism impacts carries broader ramifications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, the failure to analyse environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies culminate in a significant evidential gap. This inhibits a thorough evaluation of economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm presents a significant failure in meeting the criteria for sustainable development, as outlined in statutory duties and national policy. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the scale of

industrialisation was deemed unacceptable. This new proposal is put forth under a more stringent policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

This application lacks a comprehensive and dependable evidential foundation for its assessment. Notable deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways—such as effects on nocturnal wildlife, complete onshore infrastructure, and tourism—are evident. Consequently, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of significant effects or residual impacts.

Furthermore, there are evident procedural shortcomings. The failure to include a compliant Island Communities Impact Assessment is a violation of statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial omission. These flaws hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contradicts the National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain ambiguous and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing any lawful conclusion that impacts are acceptable.

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

In summary, the application is unfit for determination, both procedurally and substantively. The magnitude of information deficits, coupled with policy inconsistencies and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, the competent authority must either reject the application on these bases or invoke appropriate regulatory measures to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C02AB4B2

Member of the public 1530

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, which may not align with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There is missing critical environmental data, and baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The flexible design framework used in the application obscures the understanding of likely significant effects, and without specified mitigation measures, it is impossible to evaluate their effectiveness. Consequently, the documentation does not allow for a complete or informed assessment of environmental, cultural, or community impacts, and claims of negligible effects are unsubstantiated.

There are significant policy conflicts present. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and hinder the competent authority's ability to determine if the development is acceptable under policy guidelines.

The proposal's scale is unprecedented for this area, with large turbines situated near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of inadequate information, reliance on unspecified mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a thorough and reliable account of the environmental implications of the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable

uncertainty and hinders the application of a worst-case scenario, ultimately undermining the assessment's integrity. As a result, the impacts outlined may not truly represent the development as it will ultimately be constructed, leaving both the public and the competent authority without a clear understanding of the potential environmental consequences.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed later is unacceptable, as it obstructs a meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This approach is contrary to the core purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are significant gaps in evidence, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of comprehensive information leads to an unclear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold established 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 comply with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it is evident that impacts have not been fully assessed nor have appropriate safeguards been established.

When considered collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in its assessment of marine ecology and protected species, leading to an inadequate understanding of ecological receptors within the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity. However, the baseline data is incomplete, and the methodologies used do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A notable gap in the assessment pertains to otters, a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been properly assessed, thereby undermining conclusions regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed, with a reliance on aerial surveys leading to significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate frequent use of these waters. By not incorporating or appropriately considering such data, the assessment presents an incomplete baseline, diminishing the reliability of the conclusions.

The methodological limitations highlighted imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. Without sufficient baseline data, meaningful assessments of cumulative and indirect impacts are not achievable, which includes consideration of seasonal variations and wider ecosystem interactions. This uncertainty raises questions about the true scale 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 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 circumstances, granting consent would not be lawful.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These locations are active burial sites and hold spiritual significance, yet they have been categorised as static features in the assessment. This approach neglects their ongoing use and meaning within the community and fails to address how the proposed development will impact their setting. Such mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their integral role in community life.

Moreover, the assessment disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions, along with the longstanding relationship

between the community and the coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the evaluation. Ignoring these factors means that the cultural impact of the development cannot be accurately comprehended.

Community rights and engagement also remain inadequately addressed. The Gaelic-speaking population, which possesses characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to reflect established principles for participation in decisions that affect cultural and environmental interests.

A critical procedural failure is evident in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfill its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

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

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's proposal is surrounded by significant concerns regarding social impacts, health, and wellbeing. A Social Impact Assessment was commissioned, which included focus groups with local residents; however, the complete report has not been made available. This absence of transparency presents a considerable evidential gap, hindering both public understanding and the competent authority’s ability to grasp the full range of social risks identified in the developer’s own research.

Residents have reported experiencing tangible stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation. Nonetheless, the lack of access to the full assessment restricts proper scrutiny of the findings, thereby limiting the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Unfortunately, these impacts

have not been adequately incorporated into the main application nor given sufficient 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 compromises the Environmental Impact Assessment process. It is crucial to have a comprehensive understanding of social, economic, and health impacts for developments of this nature, especially when community character and function may be at risk. The application, by failing to provide the complete dataset, does not present a robust evidential basis to properly weigh the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and prevent harm, yet the evidence at hand points to existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are profound. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission signifies a failure to meet the evidential requirements outlined within the Environmental Impact Assessment regime.

In conclusion, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination, reinforcing the position that the application is unsupported by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The addition of large-scale turbines situated 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 assessment does not sufficiently convey the extent of this visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and commonly visited coastal locations. Consequently, this would have a direct negative effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation fails to adequately express this level of impact or its significance within the context of such a sensitive landscape.

Concerns regarding methodology arise from the selection and presentation of visual viewpoints. Evidence indicates that certain viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural

heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been understated, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. By treating these assets in isolation, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The degree of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion 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 dominant and inescapable. Consequently, the resulting change would be fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

In summary, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a dependable 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 insufficient and lacks the necessary detail to fully evaluate potential environmental effects. The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed after consent is granted, which hinders a meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures raises serious concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment

disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these risks.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application obstructs an evaluation of whether appropriate safeguards are established to manage pollution incidents. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant likely effects and mitigation measures must be assessed before consent is granted, and the absence of such information renders a lawful determination unachievable. Additionally, the application does not demonstrate compliance with policy requirements associated with environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These issues inhibit a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are known to host a diverse marine ecosystem alongside an active fishing industry, yet the proposal does not convincingly show how these habitats and uses can be preserved without significant disruption.

One major concern lies in the assumption that fishing activities can be relocated without repercussions. There is no evidence presented to suggest that alternative fishing grounds exist, are accessible, or can sustain increased pressure. This gap in information is crucial, as the potential for overfishing in other areas due to displacement poses risks to the local fishing fleet's economic viability. An absence of a clear, evidence-based assessment means that the consequences for both fisheries and the livelihoods dependent on them remain unclear.

Additionally, the proposal poses substantial risks to marine species, particularly due to

the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is expected to cause significant disturbances across wide areas, potentially affecting species like dolphins. The predicted impact on a large portion of the local bottlenose dolphin population raises serious issues, yet the application minimizes these concerns without adequate supporting evidence.

There is also a notable inconsistency in the application regarding the acknowledgement of the need for licenses to permit harm to European Protected Species, while simultaneously characterizing impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions about adherence to the Habitats Regulations, especially where expected harm necessitates legal authorisation.

Moreover, the assessment overlooks cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 and the National Marine Plan. It does not adequately illustrate that the development can coexist with existing marine users or avoid adverse impacts on marine biodiversity, which hinders 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 collectively 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 proposed development involves significant onshore infrastructure, which includes cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure through sensitive landscapes. These activities require excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, hindering an understanding of the project’s overall environmental footprint.

The separation of offshore turbines and onshore works leads to an incomplete assessment, failing to consider the cumulative effects that arise from what should be treated as a single integrated project. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing proper evaluation of all components together as required by the Environmental Impact Assessment process. Consequently, the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are serious risks to sensitive habitats such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate measures for avoidance have been implemented, indicating a clear evidential gap in biodiversity protection.

Concerns also arise regarding the carbon balance, as the disturbance of peatland may release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this critical issue, leaving it unclear whether the overall carbon balance is genuinely beneficial.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights, with the application lacking evidence of necessary consents or processes being initiated. This raises serious questions about deliverability and the lawful implementation of the project.

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

In summary, the separation of project components, coupled with the absence of a thorough assessment and a lack of evidence regarding environmental and land use impacts, renders this aspect of the application incomplete and unreliable, obstructing a lawful determination.

TOURISM

The proposed development raises considerable concerns regarding its potential impacts on tourism, a critical component of the Isle of Lewis economy. The assessment conducted is significantly inadequate, lacking a comprehensive evaluation of the economic and social ramifications for this vital sector. Tourism relies heavily on the area's natural assets, including its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While the application acknowledges that a notable 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or the economic contributions made by tourism.

Economic growth in this sector has been notable, with tourism revenue rising from £65 million in 2017 to over £81.5 million, contributing to more than 1,000 jobs and accounting for approximately 16% of the island's economy. Nevertheless, the application does not address how the anticipated industrialisation of the seascape and a decline in environmental quality would affect the Tourism Gross Value Added or the broader economic resilience of the area. This lack of modelling prevents an accurate determination of whether the proposed development would provide a net economic

benefit or jeopardise a well-established and expanding sector.

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to visitor experiences and emerging niches such as nature-based tourism and astro-tourism. The exclusion of a Dark Skies Assessment exacerbates this issue, resulting in a substantial gap in understanding the potential impacts on an increasingly important segment of the local economy.

In a context where the island community faces limited economic diversification, the oversight in assessing tourism impacts has broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, which is a requirement under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not sufficiently demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the necessity to show a net benefit. It also contradicts strategic goals that prioritise tourism as a growth sector, failing to provide the necessary evidence for the competent authority to accurately assess the economic implications of the proposal.

Overall, the cumulative effect of the inadequacies in quantifying tourism impacts, analysing the environmental drivers of visitor behaviour, and acknowledging the island's economic reliance results in a significant evidential gap. This deficiency hampers a thorough evaluation of the economic consequences, contributing to the assertion that the application remains incomplete.

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.

Additional Comments

I have great reservations what impact the construction vehicles will do to our roads, the weight of the turbines being transported will undoubtedly cause damage and create delays for island residents and tourists. We are already seeing the electricity company installing new overhead cables and causing delays for people going to or from work, plus work-sites popping up at many locations spoiling the views with porta-cabins and other heavy equipment. Sadly I often see many of the wind turbines stationary when others are working. I would also like clarification of who will be responsible for any damaged roads during the period of construction, the island has enough pot holes that are costly to repair. I hope that it will not be the local council who would have to burden the additional costs.
I also would like to know if an Electromagnetic compatibility/test has been carried out

to ensure public safety has been undertaken and documented for the complete system?

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: 0D3AA794

Member of the public 1531

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under relevant marine licensing and Environmental Impact Assessment frameworks. The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. There are significant concerns regarding the development's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The documentation provided fails to establish an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information presented is both limited and inconsistent. Key elements of the proposal remain undefined, and the flexible design framework employed does not allow for a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the information fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests required 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, with large turbines positioned in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In this context, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the potential environmental effects of the proposal. By employing a flexible Project Design Envelope without

committing to defined turbine dimensions, layouts, or configurations, the application introduces significant uncertainty. This approach hinders the consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts reported may not accurately represent the actual development, which in turn prevents both the public and the competent authority from grasping the full extent of the environmental consequences.

Moreover, the application places considerable reliance on unspecified mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental damage will be managed at a later stage, there is a significant barrier to conducting a meaningful evaluation of the measures' effectiveness or assessing any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation strategies be clearly articulated before determination.

The report also suffers from substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly inadequate, failing to offer a complete or reliable understanding of the ecological receptors present. This area is characterised as a biologically active and highly sensitive marine system, yet the baseline data collected is insufficient, and the methodologies employed do not effectively capture species

presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an incomplete assessment of the possible effects of construction disturbance, noise, and heightened activity, thereby undermining any conclusions that suggest no significant effects on this species.

In addition, the evaluation of basking sharks is flawed, as it relies on aerial surveys that introduce significant detection bias, especially under Atlantic weather conditions. This methodology is prone to underestimating the presence of basking sharks, particularly when compared to established land-based observations that indicate their frequent usage of these waters. The neglect to incorporate or appropriately consider such data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects that rest on assumptions rather than substantial evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or those of National Planning Framework 4, as there has been insufficient identification or evaluation of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues inhibit a thorough evaluation of impacts on marine ecology and protected species, supporting the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for development presents significant flaws in the ornithological assessment, which is marked by gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not face adverse effects as a result of the proposed development. Key foraging areas and migratory pathways are situated within the project's location, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

There exists a fundamental contradiction within the application, where the developer asserts that there are no significant adverse effects while concurrently advancing 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 support from the underlying evidence. Furthermore, the assessment fails to provide adequate evidence that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not sufficiently accounted for, and the dependence on modelling approaches adds uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is incomplete and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor poses an additional and significant risk, as it effectively creates a barrier within a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species that possess relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thus preventing a lawful conclusion in favour of consent.

Moreover, the deficiencies noted signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, as it is hindered by internal inconsistencies, methodological weaknesses, and insufficient evidence. Consequently, these shortcomings obstruct a robust evaluation of impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fundamentally fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where language, community, tradition, and environment are deeply intertwined. Instead of recognising heritage as a living, evolving aspect of community life, the assessment reduces it to mere isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance.

A significant oversight in the assessment is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice, yet they are inaccurately characterised as static

features. This mischaracterisation ignores their continued use and the profound impact that development may have on their surrounding environment, resulting in an incomplete evaluation of their cultural significance to the community.

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including the Gaelic language and the traditions that have long connected the community to the coastal environment. These elements are integral to the area's identity and their absence from the assessment is a significant flaw. Without acknowledging these vital factors, the true cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as Indigenous People, yet there has been no process of Free, Prior and Informed Consent initiated. This lack of meaningful engagement significantly undermines the legitimacy of the assessment, disregarding essential principles of participation in decisions that affect cultural and environmental interests.

The procedural shortcomings are compounded by the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot adequately fulfil its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination regarding the application unlawful.

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

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development remain unassessed, and the application does not provide a sufficient foundation for understanding the true cultural cost of this proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing related to the proposed development have not been adequately assessed, revealing a lack of transparency that is crucial for a lawful evaluation. Although the developer conducted a Social Impact Assessment which involved focus groups with local residents, the full report remains unpublished. This absence creates a significant evidential gap that obstructs both public understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern directly linked

to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on actual engagement rather than speculation. However, the failure to release the complete assessment hampers thorough examination of these findings and restricts the assessment of their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of “cultural loss.” Nonetheless, these social impacts have not been adequately incorporated into the main application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this magnitude, especially when community character and functioning could be at stake. Without the complete dataset, the application does not provide a thorough evidential foundation for evaluating 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 proposals are expected to foster positive health outcomes and avoid harm; however, available evidence suggests existing negative effects that have not been fully revealed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural consequences are considerable. The competent authority is unable to perform a robust evaluation of socio-economic and health implications due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment process.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of ongoing adverse impacts, renders the evaluation 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 West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The application significantly underrepresents the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from

residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not adequately convey the level of impact or its significance, particularly given the sensitivity of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the concern that the visual impacts have been understated, which undermines the credibility of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, fundamentally altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This presents not only a visual impact but also a broader cultural and spatial harm that has not been adequately addressed in the application.

From a policy standpoint, 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 settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of pollution risks and construction impacts is notably insufficient, lacking the necessary detail to evaluate potential environmental effects adequately. Substantial preparation and installation works are proposed within a high-energy

Atlantic environment, yet the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be defined post-consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is alarming, especially considering the sensitivity of the West Lewis coastline, which supports clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and possible chemical or oil spills, it fails to provide sufficient detail on preventive, controlling, or monitoring strategies.

There remains significant uncertainty concerning the scale and behaviour of sediment plumes generated from seabed disturbances and cable installation. Without thorough modelling and clearly defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to effects on marine species and habitats recognised as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures adds to these worries. By postponing contingency planning until after consent, the application obstructs the evaluation of whether proper safeguards are established to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be examined prior to consent, and 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 absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These shortcomings impede a thorough evaluation of construction and pollution risks, further underscoring that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks detail and does not adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, but the application fails to show how these habitats and uses will be protected or maintained without significant disruption.

A key problem is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can handle additional pressure. This is important, as displacement could lead to overfishing in other areas and could negatively affect the local fishing fleet's economy. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to noise generated during construction. The use of high-energy hammer piling for extended periods is expected to cause disturbance over large areas, which could impact species such as dolphins. The anticipated disturbance to a large part of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without enough supporting evidence.

There is also a clear contradiction within the application. While it acknowledges that licenses are needed to permit harm to European Protected Species, it simultaneously claims that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises issues about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises critical concerns about carbon balance. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that runs counter to the aims of renewable energy development. The application fails to sufficiently address this matter or demonstrate that the overall carbon balance remains beneficial.

Moreover, significant risks are present for sensitive habitats, including machair systems and peatland environments, which are protected by policy. There is no evidence in the application that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been taken. This indicates a troubling evidential gap

regarding biodiversity protection.

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

The assessment of onshore infrastructure is notably incomplete and neglects the full extent of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects. This division prevents a proper evaluation of cumulative impacts, as the Environmental Impact Assessment process requires a holistic consideration of all project components. The separation of offshore and onshore elements means that the combined effects on peatlands, habitats, and communities remain inadequately understood.

Additionally, the onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, poses significant risks due to its importance as a carbon store and ecologically sensitive habitat. The application does not offer a comprehensive assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly

concerning given the significance of dark skies to the region's identity and the potential for growth in sectors like astro-tourism. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is a complete lack of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not include any assessment of lighting impacts or a phototaxis study, meaning it fails to evaluate how aviation lighting might affect these species or lead to increased mortality.

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

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

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its stunning scenery, yet it does not offer a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contributions. This oversight is particularly alarming given that tourism is a vital sector, growing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island's economy. The omission of a detailed analysis on how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added and the overall resilience of the economy is unacceptable.

Moreover, the application neglects to evaluate the crucial role that environmental

quality plays in attracting tourists, which includes the significance of unspoiled landscapes and dark skies to visitor experiences. The lack of a Dark Skies Assessment only exacerbates this shortcoming, leaving an important gap in understanding the potential impacts on emerging markets such as nature-based tourism and astro-tourism. In a community with limited economic diversification, the implications of failing to assess the effects on tourism extend to employment, local businesses, and the sustainability of the community.

Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities facing the Isle of Lewis have not been examined in accordance with the requirements set out in the Islands (Scotland) Act 2018. From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4, especially regarding economic impacts and the necessity of showing a net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

The collective failures to quantify the impacts on tourism, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependencies create a substantial evidential void. This significantly hinders a thorough evaluation of the economic effects and reinforces the conclusion that the application is fundamentally 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 am a resident of the Isle of Lewis, I was born here and have lived here all my life. I have a lifelong connection to the west coast where my family are from. I regularly spend time there for recreation including walking, rowing, observing wildlife and enjoying the coastal environment.

The defining characteristic of this coastline is its openness and the uninterrupted relationship between land, sea and sky. The seascape is free of large scale industrial development which contributes to its sense of remoteness and naturalness. This is not only important to me personally but is also a key aspect of the wider areas identity and appeal.

I am concerned that the proposed offshore windfarm would introduce a prominent and industrial feature into this environment the presence of turbines would fundamentally alter how the coast is experienced from land, changing views that are currently open

and undeveloped.

I am deeply concerned about the impact on marine wildlife the I regularly observe along the west coast including seabirds and marine mammals the potential effects of this proposed development are of real concern.

In addition I recognise that the local economy and community life are closely connected in this natural environment. Activities such as tourism and outdoor recreation rely on the areas land and seascape qualities. Any degradation of these qualities will have wider impacts for how the islands are used and experienced.

My objection is therefore based on the relationship between the proposed marine development and the coastal environment as experienced from the Isle of Lewis including its seascape character, natural heritage and role in supporting local activity and recreation.

For these reasons I ask respectfully that this application is declined.

Thank you

[Redacted]

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: 70C20D7B

Member of the public 1532

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 exhibits significant deficiencies and fails to deliver a complete, transparent, and dependable account of the likely environmental effects associated with the proposal. The reliance on a flexible Project Design Envelope, which lacks a commitment to definitive turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty compromises the integrity of the assessment, obscuring the true extent of environmental impacts from both the public and the competent authority, thereby hampering informed decision-making.

Moreover, the application places substantial emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent with the understanding that environmental harm will be rectified later inhibits any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferment of crucial information to stages following consent is procedurally unacceptable and stands in opposition to the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly identified before any determination is made.

Furthermore, the report suffers from serious evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of the impacts, particularly when conclusions regarding 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 and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, as it fails 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 demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as there is no evidence that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

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

A notable gap in the assessment concerns otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range

and behavioural patterns leads to an insufficient evaluation of the potential impacts from construction activities, noise, and increased human presence. Such inadequacies undermine the conclusions drawn about the absence of significant effects on this species.

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

These methodological issues mean that any conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful evaluations of cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This uncertainty raises concerns regarding the true extent of risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The degree of uncertainty introduced impedes the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development proposal is fundamentally unreliable due to a series of internal inconsistencies, methodological flaws, and significant gaps in evidence. 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 convincingly demonstrate that these species will not face adverse effects as a result of the proposed development. Key foraging areas and migratory pathways are affected, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A contradiction arises within the application itself, where the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which only applies when significant harm is anticipated.

This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not firmly backed by the available evidence. Furthermore, the assessment does not sufficiently substantiate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling introduces uncertainties, particularly regarding species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly when baseline data is lacking and behavioural responses are not comprehensively understood.

The proposed siting of turbines within a recognised migratory corridor poses an additional significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to properly assess the long-term implications of ongoing mortality within this corridor and the potential impact on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met, invoking the precautionary principle and rendering a lawful conclusion in support of consent unattainable.

The shortcomings identified also signify a failure to adhere to the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. In summary, the assessment is rendered unreliable by its internal contradictions, methodological weaknesses, and insufficient evidence, all of which hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity lacks depth and fails to recognise the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are deeply intertwined. Rather than appreciating heritage as a dynamic aspect of community life, the application reduces it to isolated, unchanging assets. This oversimplification overlooks the ongoing social, cultural, and spiritual significance these elements hold for the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice; however, the assessment improperly categorises them as mere static features. This mischaracterisation neglects their continued use and significance, as well as the impact of development on their surroundings. Such an oversight leads to an incomplete understanding of cultural effects and disregards the integral role these sites play in community life.

A critical flaw in the process is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These shortcomings directly conflict with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

In summary, the failure to 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, leaving the application lacking a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the full Social Impact Assessment significantly undermines the integrity of the application. The developer engaged local residents through focus groups as part of the assessment, yet the comprehensive report remains unpublished. This omission creates a critical evidential gap that hinders public understanding and the competent authority's ability to evaluate social risks identified by the developer’s own research.

Available summaries highlight that residents are experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is limited, which restricts the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite this, the impacts have not been adequately incorporated into the main application or weighted appropriately. The withholding of the complete Social Impact Assessment obscures the real human and social costs associated with the development.

The implications of this lack of disclosure extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and function may be at risk. The failure to provide the complete dataset results in an application that does not present a comprehensive evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development must promote positive health outcomes and mitigate harm, available evidence suggests existing adverse effects that have not been fully revealed. The absence of the full assessment precludes any demonstration of compliance with this policy.

The procedural ramifications of this situation are substantial. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy the evidential requirements established by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the associated seascape and landscape implications is seriously flawed and does not sufficiently acknowledge the extent of change nor the sensitivity of the receiving environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. Introducing large-scale turbines in proximity to the shoreline would create a significant and ongoing industrial presence, which would fundamentally transform the character of this landscape in a permanent and irreversible way.

Moreover, the proposal fails to accurately portray the magnitude of the anticipated visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment inadequately reflects the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the actual visual impact has been minimised, which calls into question the assessment's overall reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an

incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and affecting their connection to the natural horizon. This is not merely a visual concern; it represents a wider cultural and spatial detriment that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, especially regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further weakens any assertion of policy adherence.

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a credible evaluation and reinforce the position that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures to address construction and pollution risks raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and the potential for accidental spills, it fails to provide adequate details regarding the prevention, control, or monitoring of these risks.

In addition, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies prevents a determination of the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to marine species and habitats that have already been identified as sensitive within the broader assessment.

The assessment is further compromised by the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are in place to address potential pollution events. This deferral introduces procedural risks and undermines the competent authority’s ability to assess the environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Moreover, the application does not demonstrate compliance with existing policy requirements related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, thereby reinforcing the argument 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 assessment of fisheries and marine life in the application is insufficient, lacking a robust evaluation of ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without consequence. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can support additional pressure. This omission is crucial, as such displacement poses a risk of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disturb a wide area, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays the importance of these effects, lacking adequate supporting evidence.

There is an evident contradiction in the application, acknowledging the necessity for licences to allow harm to European Protected Species while simultaneously describing such impacts as negligible. This inconsistency undermines the credibility of the assessment and raises concerns regarding compliance with the Habitats Regulations, especially where harm is predicted to require legal authorisation.

Furthermore, the assessment neglects to consider 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, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

The overall 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 proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current proposal involves significant onshore infrastructure as part of a single integrated project that has been assessed incompletely. The offshore turbines and onshore works are interconnected, yet they have been evaluated separately, leading to a fragmented analysis that conceals the true extent of environmental and socio-economic impacts.

Among the onshore components are cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically fragile habitat. The application fails to offer a thorough assessment of these impacts, hindering a comprehensive understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively; however, the division between offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain unclear.

There are notable risks to delicate habitats, including machair systems and peatland environments, which receive policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This indicates a clear lack of evidence concerning biodiversity protection.

Furthermore, the routing of the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence that the required consents or processes have been commenced, which raises concerns about the deliverability and lawful execution of the project.

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

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

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

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

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

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

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

In summary, the failure to assess dark skies and nocturnal wildlife constitutes a significant evidential gap. The absence of baseline data, impact modelling, and

species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The assessment of potential impacts on tourism is significantly lacking and fails to address the economic and social repercussions for a vital sector of the Isle of Lewis economy. With tourism being intrinsically linked to the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, the application's acknowledgment that 86% of visitors are attracted by the scenery is notable. However, it provides no quantitative evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island's economy. Nonetheless, the application neglects to model how the industrialisation of the seascape and subsequent loss of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the area. Without such critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or threaten an established and burgeoning sector.

Moreover, the assessment disregards the importance of environmental quality in bolstering tourism, which includes the crucial role of unspoiled landscapes and dark skies in enhancing visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a significant void in understanding the impacts on a recognised and expanding component of the local economy.

Given that the island community has limited economic diversification, the lack of an impact assessment on tourism has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with the requirements set out in the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This prevents 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 demonstrates a significant failure to adhere to the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis provided for this application. Critical gaps exist in baseline data, and the use of an undefined design envelope raises concerns. The application relies on unspecified mitigation measures and fails to account for significant impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as per the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment is a notable omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4. It fails to provide assurances for the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore elements remain improperly assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

This proposal would also 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 repercussions on tourism would result in permanent effects that cannot be adequately mitigated.

Collectively, 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 either refuse consent on these grounds or invoke the appropriate regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

Maybe if this development had been planned further from our coastline, I would not object.

Maybe if there were clear, independent evidence that the noise would not harm residents, I would not object.

Maybe if this were not set to be the largest turbines ever placed so close to a community, I would not object.

Maybe if the visual impact on our landscape had been properly respected, I would not object.

Maybe if the impact on wildlife, heritage, and our way of life had been fully understood and addressed, I would not object.

Maybe if our community had been genuinely listened to from the beginning, I would not object.

Maybe if there were fair compensation for those most affected, I would not object.

But none of those things have happened.

This development is too close, too large, too uncertain in its impacts, and too dismissive of the people who live here.

For these reasons, I object.

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: C1F8DBC2

Member of the public 1533

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment requirements. It is founded on a review of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposal, along with its proximity to the shore, raises serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework obstructs a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are evident and substantial policy conflicts associated with the proposal. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal raises further concerns, with large turbines positioned near the shoreline, raising issues related to landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to significant deficiencies in the Environmental Impact Assessment Report, which fails to provide a comprehensive and reliable account of the potential environmental effects associated with the proposal. The adoption of a flexible Project Design Envelope, lacking definitive turbine dimensions and configurations, creates considerable uncertainty and undermines the ability to apply a worst-case scenario consistently. This deficiency compromises the integrity of the assessment, resulting in impacts that may not accurately represent the final development, thereby obstructing the public and the competent authority from grasping the true environmental consequences.

Moreover, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later hampers 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 contradicts the Environmental Impact Assessment regime's intent, which necessitates that significant effects and mitigation measures are explicitly established before determination.

There are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Consequently, there is ambiguity surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is not reconcilable with statutory obligations.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, which encompasses requirements for biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that adequate safeguards are implemented.

Collectively, the dependence on an ambiguous design envelope, the lack of specified mitigation measures, and the deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region is biologically active and sensitive, yet the baseline data is

inadequate. The methodologies used do not adequately capture species presence, behaviour, and habitat use, which leads to an unsound evidential basis for evaluating impacts.

Specifically, the assessment neglects to properly recognise and assess the presence of otters, a European Protected Species, which actively use coastal areas for foraging and movement. This oversight includes a lack of consideration for their core foraging range and behavioural patterns. Consequently, the potential effects of construction disturbance, noise, and increased activity on this species have not been thoroughly evaluated, undermining claims of negligible effects.

There are also significant deficiencies in the assessment of basking sharks, as reliance on aerial surveys creates a detection bias, particularly in Atlantic conditions. This method likely underestimates the presence of basking sharks, especially compared to established land-based observations showing frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hampers meaningful assessments of cumulative and indirect impacts, such as seasonal variations and interactions within the wider ecosystem. This creates uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or the National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Therefore, consent cannot be lawfully granted.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a serious concern that undermines the integrity of the evaluation process. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This significant evidential gap limits both public understanding and the competent authority's ability to assess the potential social risks highlighted by the developer's own research.

Available summaries point to measurable stress, anxiety, and concern among

residents, stemming directly from the proposal's scale and proximity. These impacts are substantiated by direct engagement and are therefore not based on speculation. However, the absence of the complete assessment hampers thorough scrutiny of the findings, which in turn restricts the capacity to evaluate their importance in the decision-making process.

Furthermore, there is a perception that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Despite this recognition, these impacts have not been fully considered within the main application nor given adequate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency has far-reaching implications for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a robust evidential basis for weighing benefits against potential harm.

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

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application and fails to satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

Collectively, the failure to disclose the full Social Impact Assessment, alongside evidence of current 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 assessment of seascape, landscape, and visual impacts is inadequate and does not sufficiently capture the extent of change or the sensitivity of the environment involved. The character of the West Lewis coastline is shaped by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish an industrial presence that is continuous and dominant, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the scale of visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This level of impact and its significance in the context of such a sensitive landscape has not been properly conveyed.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This deficiency introduces a risk that the magnitude of visual impact has been understated, thereby calling into question the reliability of the assessment.

Another significant shortcoming is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of compliance with policy.

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 overwhelmingly dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

In conclusion, the assessment inadequately represents the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and bolster the argument that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks essential detail needed to thoroughly assess construction and pollution risks, rendering it materially deficient. It involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that are to be developed after consent has been granted, which prevents any meaningful evaluation of their effectiveness or adequacy.

This reliance on undefined future measures raises serious concerns, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to contamination and sediment disturbance. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate details on how these risks will be managed, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty applies to potential effects on marine species and habitats that have already been identified as sensitive in broader assessments.

Additionally, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the evaluation of whether suitable safeguards are available to address potential pollution incidents. This creates procedural risks and undermines the ability of the competent authority to effectively assess the environmental protection measures at the stage of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation measures must be evaluated prior to the granting of consent; the absence of such information means that a lawful determination cannot be made. Furthermore, the application fails to show compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts collectively demonstrate the inadequacy of the assessment. These shortcomings obstruct a comprehensive evaluation of construction and pollution risks and reinforce the assertion 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, yet the application fails to provide a robust evaluation of ecological or socio-economic impacts. The assessment of fisheries and marine life is

insufficient, as it does not demonstrate that these vital uses and habitats can be protected or maintained without significant disruption.

A critical issue arises from the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds exist, are accessible, or can support additional pressure. This significant omission risks overfishing in other areas, potentially leading to wider economic consequences for the local fleet. Without a clear, evidence-based assessment, the effects on fisheries and livelihoods cannot be fully understood.

The proposal poses substantial risks to marine species, particularly due to underwater noise generated during construction. High-energy hammer piling over an extended period is likely to cause disturbance across considerable distances, affecting species such as dolphins. There are serious concerns regarding predicted disturbance to a significant proportion of the local bottlenose dolphin population, yet the application downplays the significance of these effects, lacking sufficient supporting evidence.

There is also an inconsistency within the application, where the need for licences to permit harm to European Protected Species is acknowledged, while impacts are simultaneously deemed negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not adequately consider cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, 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 avoid unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that

traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such activities include excavation in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

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

There are also serious concerns about carbon balance stemming from this proposal. The disturbance of peatland can release carbon that has been stored, potentially incurring a carbon debt that contradicts the fundamental goals of renewable energy initiatives. The application falls short in addressing this critical issue, failing to show that the overall carbon balance is indeed favourable.

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or the overall economic contribution from tourism. This sector relies heavily on the area’s wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite tourism's growth, from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island’s economy, the assessment neglects to model the

potential effects of industrialisation on the seascape and loss of environmental quality on Tourism Gross Value Added and broader economic resilience.

Furthermore, the application does not consider the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies for visitor experiences is particularly relevant to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant gap in understanding the impacts on a key aspect of the local economy.

In a community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately 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, especially regarding economic impact and the necessity to show a net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis hinders a robust evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the criteria for sustainable development when evaluated against statutory duties and national policy. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, however, is framed within a stronger policy context that prioritises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

A reliable evidential foundation for this determination is lacking, marked by notable gaps in baseline data and the use of an undefined design envelope. It heavily relies on unspecified mitigation measures while overlooking crucial impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting a full understanding of the significant likely effects or residual impacts.

Procedural shortcomings are evident as well, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social

Impact Assessment constitutes a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In direct opposition to National Planning Framework 4, the proposal fails to ensure the protection of biodiversity, natural spaces, and cultural heritage. It does not sufficiently demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to a lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their repercussions on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals remain incomplete and, at times, inconsistent. The requisite evidential threshold needed to discount adverse effects beyond reasonable scientific doubt has not been achieved, thereby activating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and the implications for tourism represent enduring effects that cannot be mitigated to an acceptable degree.

When considered collectively, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or invoke the necessary regulatory provisions to demand the submission of the missing information.

For these reasons, a formal request is made to reject the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

Hi I just feel this will be devastating for the local economy, nature as well as visually and many others

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: AB3B5FB4

Member of the public 1534

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to provide a reliable account of the potential environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates considerable uncertainty. This approach hinders the consistent application of a worst-case scenario, undermining the assessment's integrity and obscuring the true extent of environmental impacts. As a result, both the public and the competent authority are left without a clear understanding of the potential consequences of the development.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later raises procedural concerns, as it prevents a thorough evaluation of the proposed measures' effectiveness or an assessment of residual impacts. This postponement of crucial information until after consent is granted is unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which demands that significant effects and mitigation strategies are clearly established before determination.

The report is also characterised by significant evidential weaknesses, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies generate uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated under the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity. It cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues preclude a lawful and thorough evaluation of environmental effects and prevent the competent authority from making an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Instead of offering a structured comparison of viable options based on

environmental effects, it provides a narrative of project evolution. This method does not sufficiently demonstrate that less harmful alternatives have been identified and evaluated in favour of more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impact, and the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging available option.

The inadequacies further extend to cable routing and landfall evaluation, where there is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The failure to present a clear avoidance strategy or comparative analysis implies that mitigation by design has not been employed, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout decisions, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy and prevents the competent authority from assessing whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

From a policy viewpoint, this inadequacy undermines alignment with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction disturbances, noise, and increased activity. This gap undermines any conclusions drawn regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. The development site is situated in key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already experiencing decline. However, the application fails to convincingly demonstrate that these species will not be adversely affected. It does not adequately evaluate the risks associated with displacement, collision, or habitat loss for these birds.

There exists a fundamental contradiction within the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment

and suggests that the presented conclusions lack support from the underlying evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. It does not fully consider the importance of their feeding grounds, and the reliance on modelling approaches adds a layer of uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used appear likely to underestimate mortality, especially where baseline data is inadequate and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor introduces additional significant risks, creating a barrier within a primary flight path utilized by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential effects on species that have relatively small global populations.

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

Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings obstruct a robust evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the assessment approaches cultural heritage in a reductive manner, viewing it as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

Notably, the evaluation does not adequately consider culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are active sites of burial and spiritual practice, yet the assessment regards them as mere static features, disregarding their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural ramifications and overlooks their importance in community life.

Additionally, the intangible aspects of cultural heritage, including the Gaelic language, traditions, and the enduring bond between the community and the coastal environment, are not taken into account. These elements are vital to the area's identity, yet they are conspicuously missing from the assessment, resulting in a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains unexamined.

There are pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity and the characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of genuine engagement calls into question the validity of the assessment and neglects essential principles of participation in matters that affect cultural and environmental interests.

A significant procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings conflict directly with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In conclusion, the neglect to assess living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application without a solid foundation for understanding the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment represents a significant evidential gap that undermines the entire evaluation process for this development. While the developer engaged local residents through focus groups, the lack of transparency concerning the findings prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research. Existing summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and should not be dismissed as speculative; however, without access to the complete assessment, the findings cannot be properly scrutinised, limiting their significance in the decision-making process.

Furthermore, there is a perception among residents that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the

developer's findings. Despite this critical insight, these impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, preventing a comprehensive understanding of its implications.

This lack of transparency also compromises the Environmental Impact Assessment process. An accurate assessment of social, economic, and health impacts is crucial for developments of this scale, especially when community character and functioning may be affected. Without the complete dataset, the application fails to provide a thorough evidential basis for evaluating the balance between benefits and harm. From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should support positive health outcomes and avoid harm; however, the available evidence suggests existing adverse effects that have not been fully disclosed. Consequently, compliance with this policy cannot be established in the absence of the full assessment.

The procedural implications of this situation are serious. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment regime is concerning. Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the evaluation incomplete and unreliable, hindering lawful determination and highlighting that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently address the degree of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately portray the extent of this visual change. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. Consequently, there is

a risk that the true extent of visual impact has been underestimated, which calls into question the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than recognising these sites as interdependent, the assessment treats them as isolated entities, resulting in a partial evaluation of their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a broader cultural and spatial detriment that has not been adequately evaluated within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change proposed is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines claims of compliance with policy.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings inhibit a trustworthy evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is significantly lacking in detail, which hinders the ability to evaluate the likely environmental impacts. The project entails substantial seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be devised after consent has been granted, making it impossible to adequately assess their effectiveness or sufficiency.

This reliance on vague future measures is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk of sediment disturbance and contamination. The application does acknowledge various risks, including sediment

mobilisation and the potential for accidental chemical or oil spills, yet it fails to outline sufficient strategies for prevention, control, or monitoring of these risks.

Moreover, there is uncertainty concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The lack of robust modelling and well-defined management strategies means that it is impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also extends to the possible effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application does not allow for an evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated before consent is granted. When this information is missing, a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts results in a materially deficient assessment. These shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these essential uses and habitats can be preserved or sustained without substantial disruption.

A critical concern is the assumption that fishing activity can be displaced without repercussions. The application lacks evidence that alternative fishing grounds are both available and capable of accommodating the additional pressure that would result from displacement. This oversight is important, as such displacement could lead to overfishing in other areas, potentially affecting the local fleet's economic viability. Without a solid, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise that would be generated during construction activities. The use of high-energy hammer piling for prolonged periods is expected to create disturbances over considerable distances, impacting species such as dolphins. The anticipated effects on a significant portion of the local bottlenose dolphin population are concerning, yet the application minimizes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency within the application, where the need for licences to allow harm to European Protected Species is acknowledged, while the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly in cases where anticipated harm requires legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and fishing activity displacement. A comprehensive evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the combination of insufficient evidence concerning fishing displacement, an underestimation of acoustic impacts, and internal contradictions renders the assessment incomplete and untrustworthy. These shortcomings inhibit a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore works, including cabling across protected moorland and the construction of a substation near Stornoway, which necessitates access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, obscuring the project's overall environmental footprint.

The assessment approach is fragmented, as it treats the offshore turbines and onshore works separately, failing to acknowledge the intrinsic link between these components. This separation prevents an accurate evaluation of the cumulative effects on peatlands, habitats, and local communities. The Environmental Impact Assessment process stipulates that all project components must be considered collectively; however, the current application neglects this essential requirement.

Moreover, the proposal poses significant risks to sensitive habitats, including machair

systems and peatland environments that are protected under policy. There is no evidence demonstrating that the impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, leaving a glaring gap in biodiversity protection.

Concerns regarding carbon balance are also evident, as the disturbance of peatland may release stored carbon, leading to a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this crucial issue or prove that the overall carbon balance remains beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the requisite consents or processes have been initiated, which casts doubt on the feasibility and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a serious shortfall within the Environmental Impact Assessment. The West Lewis coastline, known for its exceptionally dark skies, is crucial for environmental quality, cultural identity, and tourism, particularly in emerging sectors such as astro-tourism. The introduction of permanent red aviation lighting, which would be visible over extensive distances, risks creating an intrusive "wall of light" effect that would significantly disrupt the natural night-time environment.

There is no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning considering the significance of dark skies to the local identity. Moreover, the assessment fails to address the implications for nocturnal wildlife, including species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are particularly vulnerable to artificial lighting due to their phototactic responses that may lead to disorientation and increased collision risks. The application does not provide a lighting impact assessment or a phototaxis study, meaning the potential effects of aviation lighting on these species, along with the associated mortality risks, remain unexamined.

This critical oversight is exacerbated by an overreliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or the risks they entail. Species such as Kittiwakes, which may forage or migrate at night, are equally at risk of disorientation from artificial lighting, yet this has not been included in the assessment. The absence of specific data regarding night-time conditions creates a significant gap in understanding the ecological impacts involved.

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

From a policy standpoint, this oversight is at odds with National Planning Framework 4, which pertains to the safeguarding of natural spaces and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time environments is a fundamental component of the broader ecological context.

In summary, the absence of assessments concerning dark skies and nocturnal wildlife creates a substantial evidential void. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient for supporting a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it fails to provide a quantified analysis of how large-scale offshore infrastructure could potentially affect visitor numbers, their behaviour, or the overall economic contribution of tourism, which is a key sector of the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this, the application does not model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the community.

The assessment neglects to address the crucial role that environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies cannot be overstated, especially in relation to visitor experience and emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on these important aspects of the local economy.

In a community where economic diversification is already limited, the lack of an assessment regarding tourism impacts has broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities

have not been evaluated as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the obligation to provide evidence of net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for competent authorities to assess the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. The issues that caused the refusal of the Lewis Wind Power proposal in 2008 are repeated in this application. It presents a scale of industrialisation that is still deemed unacceptable, despite being submitted under a policy framework that places increased importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is an inadequate evidential basis for the application. Critical gaps in baseline data exist, and the design envelope remains undefined. Mitigation measures have not been specified, and key impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects have been omitted. The Environmental Impact Assessment is thus incomplete and does not facilitate a full understanding of likely significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, and the omission of a full Social Impact Assessment is a material deficiency. These failures hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, or cultural heritage. There is insufficient evidence that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of net economic benefit. The cumulative impact of offshore and onshore elements has not been properly assessed, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential threshold needed to exclude adverse effects

beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: DB9C1B9D

Member of the public 1535

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 proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural identity. The scale and proximity of the project, along with its design, raise immediate and significant concerns about its compliance with statutory requirements, national policy, and sustainable development principles.

Critical deficiencies in the documentation undermine the possibility of a lawful determination. The application lacks an adequate evidential basis, with critical environmental data missing and baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework obstructs a clear understanding of likely significant effects. Additionally, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly assessed. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by robust evidence.

There are clear policy conflicts that further challenge the application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, cultural heritage, and health and wellbeing. The proposal does not demonstrate that national requirements for protecting biodiversity and environmental integrity can be satisfied. These conflicts directly affect the statutory tests needed for consent and compromise the authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal raises serious issues concerning landscape capacity, visual dominance, and environmental impact, especially with large turbines positioned closely to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, introduces considerable uncertainty. This uncertainty hampers the

assessment's integrity, making it difficult for both the public and competent authority to grasp the full extent of the environmental impacts.

The application depends heavily on mitigation measures, monitoring strategies, and management plans that are not yet defined. Consent is requested on the premise that any environmental harm will be managed later, hindering a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and goes against the intent of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly established prior to decision-making.

There are also significant gaps in baseline data, limitations in the methodology, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces a level of scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential standard required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it presents a narrative detailing the project's evolution. This method does not show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

A lack of transparent or evidence-based comparison is evident in the evaluation of alternative offshore locations, development scales, and design configurations. Notably, the application does not reflect that the developer has seriously considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts

would be diminished. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the failure to include such analysis prevents any conclusion that the proposed siting is the least damaging option.

Deficiencies are also present in cable routing and landfall assessment, with insufficient evidence indicating that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, instead relying on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This is a clear failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to determine whether less harmful and more appropriate alternatives exist. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant material flaw that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species in the application is insufficient, leading to an incomplete understanding of ecological receptors in the West Lewis coastal area. This marine environment is known for its sensitivity and biological activity, yet the baseline data provided is inadequate, and the methods employed do not sufficiently identify species presence, behaviour, or habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for determining potential impacts.

One critical area of concern is the failure to adequately assess otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their active use of coastal regions for foraging and movement. This oversight neglects their core foraging range and behavioural characteristics, leading to an inadequate evaluation of the impacts arising from construction disturbances, noise, and heightened activity. Such omissions undermine any assertions about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys that may introduce significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks

when compared to established land-based observations, which indicate their frequent usage of these waters. By failing to integrate or adequately consider this data, the assessment presents an incomplete baseline that diminishes the validity of its conclusions.

These methodological shortcomings result in the assessment's conclusions of negligible or non-significant effects being based more on assumptions than on substantiated evidence. The lack of adequate baseline data inhibits a thorough evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty casts doubt on the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the standards set by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies precludes a definitive conclusion regarding the absence of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, the granting of consent would not be legally justified.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and conclusions that lack support renders the assessment unreliable. These inadequacies hinder a comprehensive evaluation of impacts on marine ecology and protected species, affirming that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the development application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to adequately demonstrate that these seabird species will not be adversely affected, particularly in key foraging areas and migratory pathways, while the implications of displacement, collision risk, and habitat loss are not robustly evaluated.

A serious contradiction exists within the application, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only 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 provided. The assessment does not sufficiently establish that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. It fails to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, especially for species such as Kittiwakes and Fulmars that are experiencing severe decline. The methodologies employed are likely to underestimate mortality, particularly when baseline data is lacking and behavioural responses are not

completely understood.

The placement of turbines within a recognised migratory corridor poses a significant risk, potentially creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations considered. 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, coupled with data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and precludes 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 positions the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to methodological weaknesses, internal inconsistencies, and inadequate evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is fundamentally flawed due to a lack of transparency surrounding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report remains unpublished. This creates a significant evidential gap, obstructing both the public and the competent authority from grasping the full extent of social risks as identified by the developer's own research.

Summaries indicate that local residents are already facing measurable stress, anxiety, and concern as a result of the scale and proximity of the proposal. These impacts arise from direct engagement, making them factual rather than speculative. However, without the complete assessment, there is insufficient scrutiny of these findings, which limits the capacity to ascertain their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment

process, as a thorough understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly where community character and functioning could be at stake. The application, by omitting the full dataset, does not provide a comprehensive evidential basis to assess the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is crucial that development supports positive health outcomes and mitigates harm; however, existing evidence indicates adverse effects that remain undisclosed. Without the full assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of this situation are significant, as the competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material failure in the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not accurately convey the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and frequently used coastal locations. This dominance would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within such a sensitive landscape context.

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

Another significant shortcoming is the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting, visually and spatially linked to the Atlantic horizon. Treating these as isolated assets instead of recognising their interdependence leads to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This presents not only a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy perspective, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment undermines any claims of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess environmental impacts, particularly concerning construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that are to be developed after consent, which raises immediate concerns about the adequacy and effectiveness of such plans. This is especially troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment.

Risks associated with sediment mobilisation and accidental spills of chemicals or oil have been acknowledged in the application; however, there is insufficient information on how these risks will be managed, controlled, or monitored. Furthermore, there is considerable uncertainty regarding the nature and scale of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the potential ecological effects, duration, or extent of these impacts. This uncertainty also applies to marine species and habitats that are already recognised as sensitive within the broader assessment.

The shortcomings are exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether adequate measures are in place to address pollution events. This creates procedural risks and limits the competent authority's capacity to assess environmental protection effectively at the point of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that significant effects and mitigation measures be evaluated before consent is granted, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with essential policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented regarding fisheries and marine life is fundamentally inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. Off the West Lewis coast, there exists a rich marine ecosystem alongside a thriving fishing industry. However, the application does not provide assurances that these vital uses and habitats can be preserved or maintained without experiencing significant disruption.

A key concern arises from the assumption that fishing activities can be relocated without negative consequences. The application fails to furnish any evidence supporting the availability or accessibility of alternative fishing grounds that could accommodate additional pressure. This significant gap in information raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Additionally, the proposal poses considerable risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling over extended durations is likely to disturb marine life across extensive distances, notably affecting species such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application minimises the significance of these impacts without adequate supporting evidence.

There is a notable inconsistency within the application itself, where the necessity for licenses to permit harm to European Protected Species is acknowledged, while simultaneously describing impacts as negligible. This contradiction casts doubt on the

assessment's credibility and raises issues regarding compliance with the Habitats Regulations, especially when harm is expected at levels necessitating legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thus obstructing any conclusions that the project can be considered sustainable.

In summary, the deficiencies highlighted—namely the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies—render the assessment incomplete and unreliable. These issues collectively hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally lacking and does not consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the associated onshore works are interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of both environmental and socio-economic effects.

Among the onshore elements are cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities entail 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 fails to provide a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are inadequately understood.

Significant risks to sensitive habitats, including machair systems and peatland environments, are also present and are afforded policy protection. The application does not adequately demonstrate that impacts on these habitats have been thoroughly

assessed or that suitable avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains positive.

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, which raises serious questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove 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 segment of the application incomplete and unreliable, thus preventing a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are drawn to the Isle of Lewis by its scenery. However, it lacks a quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given the significant growth in the tourism sector, which has increased from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. The failure to model the potential impacts of industrialisation on the seascape and environmental quality raises serious questions about the net economic benefit of the development and its implications for a vital and growing sector.

Moreover, the assessment neglects the critical role of environmental quality in sustaining tourism. Unspoiled landscapes and dark skies are fundamental to visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding the potential impacts on a significant and developing part of the local economy.

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

2018.

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

Collectively, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic reliance results in a significant evidential gap. This prevents a thorough evaluation of economic effects and supports the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was noted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential basis for proper determination.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, unspecified mitigation measures, and crucial omissions regarding impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

Procedurally, there are notable failures as well. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment is a substantial omission. These issues prevent the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, fails to validate acceptable health and wellbeing impacts, and lacks evidence for a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately conducted, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are considerable and potentially

significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing 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 adequately mitigated.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 118CD902

Member of the public 1536

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation has revealed significant planning, environmental, cultural, and procedural deficiencies.

The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. However, the scale and design of the proposed development pose serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Moreover, the application lacks an adequate evidential basis necessary for lawful determination. Missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal contribute to a significant lack of clarity. The use of a flexible design framework complicates understanding of potential significant effects, while unestablished mitigation measures leave their efficacy unassessed. Consequently, this documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects unsupported by robust evidence.

Furthermore, there are evident policy conflicts present within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

Given the unprecedented scale of this proposal and the placement of large turbines close to the shoreline, significant concerns arise related to landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and reliable evaluation of the potential environmental impacts of the proposal. The incorporation of a flexible Project Design Envelope, which does not commit to particular turbine sizes, arrangements, or configurations, introduces a substantial level of uncertainty. This approach hampers the ability to apply a consistent worst-case scenario, thereby compromising the assessment's integrity. Consequently, the impacts outlined may not accurately represent the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental consequences.

The application places excessive reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be rectified later prevents a meaningful assessment of the effectiveness of these measures or the evaluation of residual impacts. Deferring critical information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies be clearly defined before any determination is made.

Furthermore, there are considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of potential impacts, especially when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and vulnerable habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it does not convincingly establish that impacts have been thoroughly assessed or that suitable safeguards exist.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, which is a crucial requirement of the Environmental Impact Assessment regime. Instead of delivering a well-structured and reasoned analysis of realistic alternatives based on their environmental effects, it presents a narrative detailing the evolution of the project. This

method does not convincingly show that less harmful options have been adequately identified, evaluated, and chosen over more damaging alternatives.

There is a noticeable absence of transparent and evidence-based comparisons regarding alternative offshore locations, varying development scales, or differing design configurations. Specifically, the application fails to indicate that the developer has genuinely considered positioning turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline's sensitivity and the critical role of proximity to shore in determining impact highlight the necessity of such analysis, which is unfortunately missing, preventing any conclusion that the proposed site represents the least damaging choice.

The shortcomings also extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to mitigate impacts on sensitive receptors. This includes notable sites of cultural and spiritual significance, such as Barvas Cemetery. The lack of a definitive avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, relying instead on measures aimed at alleviating impacts after the design phase.

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

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, leading to a lack of reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised by high biological activity and sensitivity. However, the methodologies employed in the assessment fail to adequately document species presence, behaviour, and habitat use, resulting in an incomplete dataset that undermines the evaluation of potential impacts.

One major shortcoming is the inadequate consideration of otters, a species protected under European law. The application does not properly identify or assess their active use of coastal areas, crucial for foraging and movement. By neglecting their core

foraging range and behaviour, the potential impacts of construction disturbance, noise, and increased human activity are not sufficiently evaluated. This gap significantly undermines any claims about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces a considerable risk of detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence in these waters. Established land-based observations indicate that these waters are frequently utilised by basking sharks, yet such relevant data has not been appropriately integrated into the assessment, resulting in an incomplete baseline that further weakens the overall conclusions.

These methodological shortcomings mean that the conclusions suggesting negligible or non-significant effects rely more on assumptions than on robust evidence. The lack of adequate baseline data hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including variations by season and interactions within the wider ecosystem. Consequently, there is considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application falls short of the Environmental Impact Assessment requirements and the National Planning Framework 4, primarily due to the inadequate identification and assessment of protected species. The degree of uncertainty involved prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the assessment's unreliable nature stems from incomplete baseline data, flawed methodologies, and conclusions lacking adequate support. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is marred by significant methodological weaknesses and internal inconsistencies, resulting in an unreliable evaluation of impacts. Notably, the application does not adequately demonstrate that internationally important seabird populations, many of which are already in decline, will remain unaffected by the proposed development. The west coast of the Isle of Lewis is a critical habitat for these species, yet the assessment fails to provide sufficient evidence that their foraging areas and migratory pathways will be preserved.

Moreover, a fundamental contradiction is evident within the application. While the developer asserts that there will be no significant adverse effects, they simultaneously advance a Habitats Regulations derogation case, which is only required in scenarios where significant harm is anticipated. This inconsistency raises serious doubts about the validity of the conclusions drawn in the assessment, indicating that they are not

substantiated by the underlying evidence.

The assessment also does not adequately address the importance of key feeding grounds associated with protected sites such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces substantial uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, and there is a likelihood that mortality rates are underestimated. This concern is exacerbated by incomplete baseline data and a lack of understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor adds another layer of risk, creating a potential barrier to primary flight paths used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality within this corridor, particularly for species with small global populations, have not been adequately assessed.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to ascertain 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, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which hampers a lawful conclusion in favour of granting consent.

Furthermore, the identified deficiencies reflect a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places this proposal in direct opposition to national policy. Collectively, these factors culminate in the conclusion that the assessment does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intricately connected. However, the assessment of cultural heritage and community identity fails to acknowledge this dynamic relationship, treating heritage merely as isolated, static assets. This reductive approach neglects the ongoing social, cultural, and spiritual functions that these heritage sites perform within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These cemeteries are active places of burial and spiritual practice; yet, they have been categorised as static features in the assessment. This mischaracterisation overlooks their continued use and meaning, as well as the potential impacts of development on their setting. Such an incomplete evaluation disregards their vital role in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the

Gaelic language and local traditions, which are central to the area's identity. The absence of these elements signifies a considerable omission, preventing a thorough understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity akin to that of an Indigenous People, yet the application lacks any process of Free, Prior and Informed Consent. This significant oversight undermines the legitimacy of the assessment and neglects established principles of meaningful participation in decisions that affect cultural and environmental interests.

Another critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this necessary assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, leading to a determination that is not lawful.

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

In summary, the shortcomings in assessing living heritage, intangible cultural values, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application lacks a solid foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that compromises the integrity of the planning application. The developer's own focus groups with local residents indicate that there are measurable levels of stress, anxiety, and concern regarding the proposal’s scale and proximity. These impacts, derived from direct engagement, highlight an ongoing situation that cannot be dismissed as speculative. However, the absence of the full report hampers the ability of both the public and the competent authority to understand the comprehensive social risks identified.

This lack of transparency also extends to the perceived threat the proposal poses to community identity and cohesion, with “cultural loss” explicitly mentioned in the developer's findings. Yet, these serious concerns have not been adequately reflected in the main application, nor have they been given the attention they warrant. By withholding the complete Social Impact Assessment, the true human and social costs associated with the development remain obscured.

The implications for the Environmental Impact Assessment process are profound. A thorough understanding of the social, economic, and health impacts is essential for

developments of this magnitude, especially when considering potential effects on community character and functioning. Without access to the full dataset, the application lacks a robust evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not comply with the National Planning Framework 4 regarding health and wellbeing. It is imperative for developments to support positive health outcomes and mitigate harm. The existing evidence of adverse effects, which has not been fully disclosed, calls into question the application's adherence to this policy.

Furthermore, the procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This oversight represents a material omission in the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the failure to disclose the full Social Impact Assessment, coupled with clear evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation undermines the possibility of a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines in close proximity to the West Lewis coastline, a region characterised by its open Atlantic horizon, undeveloped landscape, and strong sense of remoteness. This industrial presence would fundamentally alter the area's character, leading to a permanent and irreversible transformation of the landscape. The assessment of the visual and landscape impacts is materially deficient, failing to adequately represent the magnitude of change. The turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the defining qualities of naturalness and remoteness.

Moreover, there are methodological concerns surrounding the selection and presentation of visual viewpoints, as evidence suggests that they may not fully capture the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact has been understated, consequently undermining the reliability of the assessment.

A significant deficiency 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 integral to a wider landscape setting that connects visually and spatially to the Atlantic horizon. The assessment inaccurately treats these sites as isolated, failing to recognise their interdependence and resulting in an incomplete evaluation of impacts on their settings

and cultural significance. The industrialisation of the seascape would sever these critical relationships, fundamentally altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon.

From a policy standpoint, the proposal conflicts 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 settings of culturally significant sites. The absence of a thorough worst-case assessment further challenges any claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated due to the turbines' scale, height, and proximity, making their presence dominant and unavoidable. The change would be fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts. Collectively, these deficiencies in the assessment fail to represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. This reinforces the conclusion that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents a materially deficient assessment of construction and pollution risks, failing to provide the necessary detail to evaluate likely environmental effects. Despite the proposal involving significant seabed preparation and installation works in a high-energy Atlantic environment, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed post-consent, thereby hindering a meaningful assessment of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, 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 accidental chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the evaluation of whether suitable safeguards are established to address pollution events.

This introduces procedural risk and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are evaluated prior to consent, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies related to the undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively indicate that the assessment is materially deficient. These inadequacies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries associated with the application is inadequate, failing to offer a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast host a rich marine ecosystem alongside an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses will be protected or maintained without significant disruption.

A notable concern arises from the assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This gap is critical, as such displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the effects on fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is concerning; nevertheless, the application tends to underestimate the significance of these effects and lacks adequate supporting evidence.

There exists a contradiction within the application regarding the necessity of licences for harming European Protected Species, while impacts are concurrently described as negligible. This inconsistency undermines the assessment's credibility and raises serious questions about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment does not address cumulative impacts resulting from various pressures such as habitat disruption, 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 adequately show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus hindering the determination of whether the proposal constitutes sustainable development.

In conclusion, the deficiencies in evidence concerning 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 impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes onshore infrastructure that is linked to offshore turbines but is assessed separately, leading to an incomplete evaluation of its impacts. This fragmented approach fails to reveal the full scale of environmental and socio-economic effects that arise from this integrated project. The onshore works consist of cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly in Barvas Moor, which is ecologically significant and acts as a carbon store. The assessment does not adequately cover these impacts, thus hindering a complete understanding of the project's environmental footprint.

Furthermore, the exclusion or deferral of onshore impact assessments prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively, yet the separate treatment of offshore and onshore elements results in a lack of clarity regarding the combined effects on peatlands, habitats, and surrounding communities. There are notable risks posed to sensitive habitats such as machair systems and peatland environments, which are already protected by policy. The application fails to show that impacts on these habitats have been fully assessed or that appropriate avoidance strategies are in place, highlighting a significant evidential gap in biodiversity protection.

Concerns also emerge around the project's carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that undermines the goals of renewable energy initiatives. The application does not sufficiently address this critical issue or demonstrate that the overall carbon balance remains beneficial. Additionally, the routing of infrastructure through active croft land introduces possible conflicts with established land use and legal rights. There is no evidence provided that necessary consents or processes have been initiated, raising serious doubts about

deliverability and lawful execution.

From a policy viewpoint, the failure to assess the project in its entirety and to ensure the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Collectively, the division of project components, the lack of a thorough assessment, and the absence of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, which play a vital role in shaping the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This would drastically change the night-time environment.

Furthermore, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to the local identity and the growing tourism sectors, such as astro-tourism. The failure to address these impacts signifies a clear gap in the overall assessment of landscape and environmental factors.

Most importantly, there is no analysis of the potential effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting, which can lead to disorientation and increased collision risk. The application lacks any lighting impact assessment or phototaxis study, thereby failing to evaluate how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal behaviour or the associated risks. Kittiwakes, for instance, may forage or migrate at night and could be similarly affected by disorientation from artificial lighting. The absence of site-specific night-time data creates a critical void in understanding ecological impacts.

Without a comprehensive assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites might be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4

regarding the protection of natural places and the quality of the environment. Moreover, it undermines a broader assessment of landscape and seascape impacts, as the character of night-time environments is integral to overall environmental quality.

Overall, the lack of assessment concerning dark skies and nocturnal wildlife constitutes a considerable evidential gap. The omission of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of substantiating a lawful determination.

TOURISM

The application does not adequately assess the impact on tourism, a crucial sector for the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle of Lewis has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear if the proposed development would generate a net economic benefit or harm an already established and growing sector.

The assessment neglects to address the significance of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are vital to visitor experience, including emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding the impacts on a key and expanding part of the local economy.

In an island community with limited economic diversification, failing to evaluate the impacts on tourism carries broader ramifications for employment, local businesses, and community sustainability. The omission of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic

dependencies results in a significant lack of evidence. This hinders a thorough evaluation of the economic effects and supports the view that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. Notably, this new application is presented within a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

A thorough evidential basis for the determination of the application is lacking, with significant gaps in baseline data. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of critical impact pathways—such as those affecting nocturnal wildlife, onshore infrastructure, and tourism—further contribute to an incomplete Environmental Impact Assessment. Consequently, this incompleteness hinders a full understanding of likely significant effects and residual impacts.

Moreover, procedural failures are apparent in this application. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose a complete Social Impact Assessment is a material omission. These shortcomings impede the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4 as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable, and it cannot provide 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, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent within themselves. The necessary evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, precluding a lawful conclusion 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, disruptions to cultural and visual relationships, and negative impacts on

tourism represent permanent changes that cannot be mitigated to an acceptable extent.

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

In light of these points, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

I fear the impact of this development will not benefit the local economy. The environment will be changed forever for short term gain. A few people will make some money during the development but the reality will be devastating going forward.

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: CD6F420D

Member of the public 1537

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or reliable overview of the anticipated environmental effects of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers the consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the presented impacts may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As such, consent is sought based on the premise that environmental harm will be managed later. This approach undermines any meaningful evaluation of effectiveness or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also notable evidential deficiencies, which include gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially where findings of negligible or non-significant effects are presented without robust supporting data. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to show compliance with National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development fails to adequately assess alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of feasible alternatives based on their environmental impacts, the application presents a narrative of the project's evolution.

This method does not sufficiently show that the developer has identified, assessed, and chosen less harmful options over more damaging ones.

A notable lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations exists. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline, as well as the significance of proximity to shore in assessing impact, this lack of analysis hinders the ability to conclude that the proposed siting is the least damaging option.

Moreover, the shortcomings are evident in the assessments of cable routing and landfall, where there is inadequate evidence to suggest that alternative routes have been properly examined to avoid or lessen effects on sensitive receptors. 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 illustrate that mitigation by design has not been incorporated, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a thorough alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies detract from compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that leads to the conclusion that the application has not undergone sufficient evaluation and cannot justifiably support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is insufficient and fails to deliver a thorough and dependable understanding of ecological receptors. This marine system is both biologically active and sensitive, yet the baseline data remains incomplete, while the methodologies employed do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a sound evidential basis for the evaluation of impacts.

Significant shortcomings pertain to 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. The omission of their core foraging range and behavioural patterns means that potential impacts from construction disturbance,

noise, and increased activity have not been sufficiently examined. This gap undermines any conclusions regarding the lack of significant effects on this species.

Deficiencies are also evident in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that show frequent utilisation of these waters. The failure to include or properly account for such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, as well as seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true extent 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 thoroughly identified or evaluated. The uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, granting consent cannot be justified.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a comprehensive evaluation of impacts on marine ecology and protected species, contributing to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the ornithological assessment related to the development application is materially flawed, containing significant evidence gaps and internal inconsistencies that undermine its conclusions. The application fails to adequately demonstrate that these species will not be adversely affected, despite being located within key foraging areas and migratory pathways. It does not robustly evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application itself; the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the evidence provided.

The assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species that are in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

From a regulatory standpoint, the application fails to meet the evidential threshold required to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

The deficiencies noted also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy.

Overall, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such failings prevent a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a narrow perspective, viewing heritage merely as a collection of isolated and static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A primary shortcoming is the treatment of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment misclassifies them as static features, overlooking their ongoing use and meaning, as well as the implications of development on their surroundings. This mischaracterisation results in an incomplete analysis of

cultural effects and neglects their vital role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language and the community's enduring relationship with the coastal environment. These components are integral to the area's identity yet are entirely omitted from the assessment, which constitutes a significant gap. A proper understanding of the cultural impact of the development is unattainable without these considerations.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinctive cultural identity, recognised as characteristic of an Indigenous People, but the process of Free, Prior and Informed Consent has not been undertaken. This lack of meaningful engagement undermines the validity of the assessment and does not align with established principles for participation in decisions impacting cultural and environmental interests.

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

From a policy standpoint, these deficiencies position the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and locations. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly diverges from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application does not offer a solid foundation for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment has not been fully published, resulting in a significant evidential gap. This lack of transparency limits both public understanding and the competent authority's ability to evaluate social risks identified in the developer's own research. While available summaries indicate that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, the absence of the complete assessment hinders proper scrutiny of these findings and restricts the decision-making process regarding their significance.

Moreover, the perception of the proposal as a threat to community identity and cohesion has been noted, with "cultural loss" highlighted in the developer's findings.

However, these impacts have not been adequately incorporated into the main application or assigned the necessary weight. The non-disclosure of the full Social Impact Assessment therefore obscures the actual human and social costs of the development.

This opacity also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning are at stake. Without the complete dataset, the application lacks a comprehensive evidential basis to assess 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 expected to foster positive health outcomes and mitigate harm; however, the evidence available points to adverse effects that remain undisclosed. Consequently, the absence of the full assessment precludes any demonstration of compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material failure within the application, breaching the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with the documented existing adverse impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and substantiates the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of visual, seascape, and landscape impacts is severely lacking, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, which contributes to its undeveloped nature and profound sense of remoteness. The planned installation of large-scale turbines near the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The application inadequately addresses the magnitude of visual change that would occur. Due to their scale and proximity, the turbines would overpower views from residential areas, historic sites, and popular coastal locations, thus directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. This significant impact has not been properly conveyed, which is particularly concerning given the sensitivity of the landscape in question.

Methodological issues are evident in the selection and presentation of visual

viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the broader landscape by visual and spatial relationships with the Atlantic horizon. The evaluation incorrectly treats these assets as isolated, failing to recognise their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertions of policy compliance.

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

In conclusion, the assessment is inadequate in representing the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the position that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate. It lacks the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation in a high-energy Atlantic environment, yet no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans have been provided. Instead, the application depends on mitigation and contingency measures to be developed after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is alarming due to the sensitivity of the

surrounding environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not sufficiently outline how these issues will be prevented, controlled, or monitored.

There is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without effective modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to possible effects on marine species and habitats already recognised as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures heightens these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards exist to address pollution incidents. This introduces procedural risks and compromises the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, delaying essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and when such information is lacking, a lawful determination cannot occur. The application does not 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 fundamentally flawed. These deficiencies hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment related to fisheries and marine life is profoundly inadequate, lacking a thorough evaluation of the ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a bustling fishing industry. However, the application does not provide assurance that these vital uses and habitats will be safeguarded or maintained without substantial disruption.

A critical concern arises from the assumption that fishing activities can simply be displaced without repercussions. The application fails to present any evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This significant gap in the assessment raises the risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based analysis, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses serious risks 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 disturb marine life across considerable distances, especially species such as dolphins. The predicted disturbance to a considerable segment of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects, lacking sufficient evidence to support its claims.

There is a troubling inconsistency within the application where the need for licenses to permit harm to European Protected Species is acknowledged, while simultaneously describing the impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises alarming questions regarding compliance with the Habitats Regulations, especially where harm is anticipated to an extent that necessitates 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. Without a comprehensive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally inadequate and does not encompass the full range of impacts stemming from what is a singular, integrated project. The offshore turbines are fundamentally connected to the onshore works, yet they are evaluated separately, leading to a disjointed approach that obscures the true magnitude of the environmental and socio-economic repercussions.

Onshore components include cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas characterised by deep peat, particularly within Barvas Moor, which is a crucial carbon store and an ecologically fragile habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the

overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application inhibits a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project are considered collectively, yet the separation of offshore and onshore aspects leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been put in place. This creates a notable evidential gap in relation to biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application does not provide proof that necessary consents or processes have been initiated, which brings into question the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal presents a significant evidential gap due to the absence of assessments concerning dark skies and nocturnal wildlife, which are crucial components of the Environmental Impact Assessment. The exceptionally dark skies of the West Lewis coastline contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This alteration of the night-time environment raises concerns regarding visual amenity, landscape character, and the experiences of residents and visitors.

Furthermore, there is a critical lack of evaluation regarding the impacts of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The application notably lacks a lighting impact assessment or a phototaxis study, failing to address how the proposed aviation lighting may impact these

vulnerable species or potentially raise mortality rates.

The shortcomings are exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate during the night, are similarly at risk of disorientation due to artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates an essential gap in understanding the ecological impacts of the proposal.

As a result, it is impossible to ascertain whether protected species or designated sites would be adversely affected without a thorough assessment of nocturnal impacts. The application fails to meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and preventing a lawful determination.

In terms of policy, the omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader assessment of landscape and seascape impacts, as the character of the night environment is an integral aspect of the overall ecological setting.

In summary, the absence of any assessment focused on dark skies and nocturnal wildlife reveals significant flaws in the application. The lack of baseline data, impact modelling, and species-specific analysis renders it incomplete, thus incapable of supporting a lawful determination.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are drawn by scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution. The tourism sector has seen significant growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the application fails to model how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such analysis, it is unclear whether the development would result in a net economic benefit or undermine an essential and expanding sector.

Moreover, the assessment neglects the importance of environmental quality for tourism, particularly how unspoiled landscapes and dark skies enhance the visitor experience and support emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in understanding its impacts on a recognised and growing segment of the local economy.

Given the island community's limited economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and

community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

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

Overall, the inability to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and consider the island's economic reliance leads to a significant evidential gap. This hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory obligations, national policies, and evidential standards. It echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. This current application is presented under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of local communities.

There are substantial deficiencies in the evidential basis for the proposal, including critical gaps in baseline data and the utilisation of an undefined design envelope. The application relies on unspecified mitigation measures and fails to consider essential impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering the ability to fully comprehend likely significant effects or residual impacts.

Furthermore, the application contains notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contravenes the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Additionally, there is a failure to establish a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, clouding the

understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making a lawful conclusion regarding acceptable impacts unattainable.

This proposal would result in 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 connections, and negative impacts on tourism would create permanent effects that cannot be adequately mitigated.

In conclusion, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs the possibility of a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or exercise the relevant regulatory powers to demand the missing information.

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

Yours faithfully,

[Redacted]

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