Member of the public 1538

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 is currently under marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents, highlighting deficiencies in planning, environmental aspects, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area with a coastline facing the Atlantic, known for its near-pristine environment and strong cultural heritage.

Concerns arise due to the unprecedented scale of the proposal, which features large turbines placed close to the shoreline. This positioning raises significant issues related to landscape capacity, visual impact, and overall environmental effects. The application lacks a solid evidential foundation for lawful determination, missing critical environmental data, while baseline information is often inconsistent or insufficient. Many key aspects of the proposal remain unclear, and the flexible design framework obstructs a comprehensive understanding of potential significant effects. Furthermore, the proposal relies on unspecified mitigation measures, rendering it impossible to assess their effectiveness. As a result, the available documentation does not provide a thorough understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects lack strong evidential support.

Substantive policy conflicts exist, with the proposal appearing at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly impact the statutory tests for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined design envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and undermines the

assessment's integrity, making it impossible to accurately evaluate worst-case scenarios. As a result, the impacts presented may not truly represent the development that is ultimately constructed, leaving both the public and the competent authority without a clear understanding of the environmental effects.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a full and reliable account of the likely environmental impacts of the proposal. It depends heavily on undefined mitigation measures, monitoring strategies, and management plans, which have yet to be articulated. By seeking consent based on the premise that environmental harm will be addressed later, the application effectively precludes any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to any determination.

Furthermore, there are notable evidential deficiencies present, including significant gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hinders the ability to clearly understand cumulative and worst-case impacts, thereby introducing scientific uncertainties that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it does not adequately show that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and insufficient 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 an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete and reliable understanding of ecological receptors. The baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been sufficiently evaluated. Such omissions undermine any claims regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks suffers from significant deficiencies. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions, which is likely to lead to an underestimation of their presence. This contrasts sharply with established land-based observations indicating frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This creates uncertainty about the true scale of risk to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies 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.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application reveals significant gaps in evidence and internal inconsistencies that challenge 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 satisfactorily demonstrate that these species will not be adversely affected. The proposed development is situated within crucial foraging areas and migratory pathways, yet the assessment fails to rigorously analyse the potential impacts of displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application itself, as the developer asserts no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the

assessment and suggests that the conclusions are not substantiated by the underlying evidence.

Moreover, the assessment does not adequately establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling approaches introduces further uncertainty, particularly concerning species experiencing severe population declines like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The placement of turbines within an established migratory corridor adds a further layer of significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential threshold to confirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, in conjunction 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 precludes a lawful conclusion supporting consent.

Ultimately, the deficiencies identified in the assessment signify non-compliance with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected directly contravenes national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, culminating in the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is seriously lacking. It fails to recognise this area as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, unchanging assets, rather than understanding their dynamic social, cultural, and spiritual roles within the community.

A major shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practices, but the assessment categorises them as static features. This approach neglects their ongoing use and meaning, as well as the potential impacts

of development on their surroundings. As a result, the evaluation of cultural effects is incomplete and does not reflect their importance in community life.

Moreover, the application overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are absent from the assessment, representing a significant oversight. Without addressing these factors, the true cultural impact of the development remains unclear.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that aligns with characteristics of an Indigenous People. However, no Free, Prior and Informed Consent process has been undertaken. This lack of meaningful engagement undermines the credibility of the assessment and does not reflect the established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural error 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 meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical issue 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 absence creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the extent of social risks identified through the developer's own research.

Initial summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts

are a direct result of community engagement and are not speculative in nature. However, the non-disclosure of the complete assessment limits the potential for proper scrutiny of the findings and reduces the opportunity to assess 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 the developer noting "cultural loss" in their findings. Despite this recognition, these social impacts have not been adequately incorporated into the primary application or weighted appropriately. The failure to provide the full Social Impact Assessment obfuscates the true human and social costs associated with the development.

This deficiency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when considering potential effects on community character and functioning. The lack of a complete dataset impairs the application's ability to furnish a comprehensive evidential basis for evaluating the balance between benefits and potential harm.

From a policy standpoint, the application does not adequately demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and avoid harm, yet the evidence at hand points to existing adverse effects that have not been fully addressed. Without the full assessment, demonstrating compliance with this policy is unfeasible.

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 within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation precludes a lawful determination and reinforces the position 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 proposal lacks sufficient detail concerning construction and pollution risks, rendering the assessment materially deficient. It involves significant seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be devised post-consent. This reliance on undefined future measures raises serious concerns, particularly given the sensitivity of the receiving environment, which includes the West Lewis coastline that is home to clean coastal waters and important habitats vulnerable to sediment disturbance and contamination.

While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail the strategies for

preventing, controlling, or monitoring these risks. Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies leaves unanswered questions about the extent, duration, and ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the assessment of whether suitable safeguards are established to address pollution events. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed prior to granting consent, and the absence of this information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, these deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The assessment of the application related to fisheries and marine life is inadequate and fails to provide a thorough evaluation of the ecological and socio-economic impacts involved. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry, yet the application does not adequately prove that these habitats and uses can be protected or maintained without substantial disruption.

A significant concern is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence showing that alternative fishing grounds are available, accessible, or capable of absorbing additional pressure. This gap in information is crucial, as displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and the livelihoods dependent on them.

The proposal also poses considerable risks to marine species, particularly due to underwater noise generated during construction. High-energy hammer piling for an extended duration is expected to disturb marine life over vast areas, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimizes the importance of these impacts without sufficient evidence to back this claim.

There exists a notable inconsistency in the application, acknowledging the necessity of

licenses to allow harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction weakens the assessment's credibility and raises concerns regarding adherence to the Habitats Regulations, especially where harm may be anticipated to a level that requires legal authorisation.

The assessment also neglects to address cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and fishing activity displacement. Without a detailed 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 National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a complete assessment of onshore infrastructure, which is critical for understanding the full impacts of this integrated project. The offshore turbines and onshore works are connected, yet they have been 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 the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts limits the understanding of the project’s overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, but the separate assessments of offshore and onshore elements mean that the combined impacts on peatlands, habitats, and communities are not fully recognised.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not show that it has fully assessed the impacts on these habitats or that it has applied appropriate avoidance measures, leading to a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting will produce a continuous and intrusive “wall of light” effect on the western horizon, fundamentally transforming the night-time environment.

Importantly, the proposal fails to assess the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially concerning due to the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The absence of this assessment results in a considerable gap in the overall environmental and landscape evaluation.

Moreover, the application does not examine the consequences of artificial lighting on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial light due to phototaxis, which increases disorientation and collision risks. The lack of a lighting impact assessment or a phototaxis study means that the proposal does not adequately evaluate how aviation lighting may endanger these species or contribute to mortality.

This gap is exacerbated by the use of daytime survey data for the ornithological assessment, which fails to account for nocturnal activities 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 evaluated. The absence of site-specific night-time data further complicates the understanding of ecological

impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude such adverse impacts beyond reasonable scientific doubt is unmet, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this oversight contradicts National Planning Framework 4, particularly concerning the protection of natural places and the quality of the environment. Additionally, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an essential component of the environment.

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife reveals a substantial evidential gap. The deficiency in baseline data, impact modelling, and species-specific analysis renders the application insufficient and unable to support a lawful determination.

TOURISM

The economic impact of tourism on the Isle of Lewis is critically significant, having grown 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 assessment conducted by the application is profoundly deficient, failing to adequately evaluate how large-scale offshore infrastructure may affect visitor numbers, behaviour, or overall economic contributions. It is acknowledged that 86% of visitors are attracted by the area's stunning scenery, yet there is no quantified analysis to demonstrate how the industrialisation of the seascape and a decline in environmental quality could influence tourism's Gross Value Added or the broader economic resilience of the island.

The importance of unspoiled landscapes and dark skies to the visitor experience and emerging tourism markets, such as nature-based and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the potential impacts on a vital and expanding segment of the local economy. Furthermore, in a community with limited economic diversification, neglecting to assess the effects on tourism raises serious concerns regarding employment, local businesses, and community sustainability.

The application does not include a compliant Island Communities Impact Assessment, resulting in an unaddressed evaluation of these economic vulnerabilities, as stipulated under the Islands (Scotland) Act 2018. Policy-wise, the failure to demonstrate compliance with the National Planning Framework 4 is evident, particularly concerning economic impact and the necessity to illustrate a net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to assess the economic ramifications of the proposal.

In sum, the lack of a comprehensive evaluation of tourism impacts, the failure to consider environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This undermines any robust evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties and national policy. This application echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains inadequate.

There is a notable lack of a complete and reliable evidential basis for determination. Critical gaps in baseline data persist, and the application relies on an undefined design envelope and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, preventing a full understanding of likely significant effects or residual impacts.

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

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, 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 effects of offshore and onshore elements have not been assessed properly, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing any lawful conclusion about the acceptability of impacts.

Substantial and irreversible changes to a highly sensitive landscape would result from this proposal. 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, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke relevant regulatory provisions to require submission of the missing information.

A formal request is therefore 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: 43F1A8D5

Member of the public 1539

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. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and accompanying documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The design, scale, and proximity of the project raise serious concerns about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are notable gaps in critical environmental data, with baseline information being both limited and inconsistent. Several key elements of the proposal are not well-defined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are also evident and substantial conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to conclude that the development can be accepted under policy considerations.

The unprecedented scale of the proposal in this area, with large turbines being positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial transparency and fails to provide a comprehensive account of the potential 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 significant uncertainty. This situation hampers the ability to apply a worst-case scenario consistently, compromising the assessment's integrity and obscuring the true environmental impacts. Consequently, both the public and the competent authority are deprived of a clear understanding of the real extent of the proposal's effects.

Additionally, the application places substantial reliance on undefined mitigation measures, monitoring strategies, and management plans. Seeking consent with the intent to address environmental harm at a later stage prevents meaningful evaluation of effectiveness and residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

Moreover, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and an overreliance on assumptions in lieu of site-specific evidence. These issues result in ambiguity concerning the scale and significance of impacts, particularly where conclusions regarding negligible or non-significant effects lack robust supporting data. The insufficient information available hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not comply with statutory requirements.

As a result, the application does not fulfil the evidential standards 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 fails to demonstrate alignment with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specific mitigation measures, and significant gaps in baseline data undermines the reliability and completeness of the Environmental Impact Assessment Report. These shortcomings prevent a lawful and rigorous evaluation of environmental effects and indicate that the competent authority lacks sufficient information to make a determination on the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in its assessment of marine ecology and protected species, failing to establish a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. The marine system in question is notably sensitive and biologically active; however, the baseline data provided is incomplete, and the methodologies employed do not effectively capture

essential information regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, featuring significant internal inconsistencies and substantial gaps in evidence that undermine its conclusions. It fails to adequately demonstrate that internationally important seabird populations, many of which are already in decline, will not be adversely affected by the proposed development on the west coast of the Isle of Lewis. This area includes key foraging zones and migratory pathways, yet the assessment does not properly evaluate the risks

associated with displacement, collision, or habitat loss.

A critical contradiction exists within the application; while the developer asserts that there will be no significant adverse effects, they also pursue a Habitats Regulations derogation case, which is only relevant where significant harm is anticipated. Such inconsistencies raise serious doubts about the credibility of the assessment and suggest that its conclusions lack the necessary supporting evidence.

The evidence presented is insufficient to assure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species that are experiencing severe decline, like Kittiwakes and Fulmars. Methodologies used in the assessment 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 recognized migratory corridor poses an additional and substantial risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations.

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

These deficiencies also constitute a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment's weaknesses in methodology, evidence, and internal consistency lead to the conclusion that it does not fulfill the statutory requirements necessary for a lawful determination.

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 assessment of the visual impacts associated with the proposed development is lacking and does not adequately convey the extent of change or the sensitivity of the local environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped landscape, possesses a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to fully capture the scale of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites,

and frequently visited coastal locations. This would adversely affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the choice and representation of visual viewpoints in the assessment. There are indications that the viewpoints selected may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly in relation to important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been downplayed, which compromises the reliability of the assessment.

Moreover, there is a notable deficiency in the evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and their relation to the natural horizon. This change signifies not just a visual impact but also a wider cultural and spatial harm that has not been sufficiently evaluated in the proposal.

From a policy perspective, this proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of change proposed is inconsistent with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Thus, the resultant change is not merely something that can be reduced to an acceptable level through mitigation efforts; it is fundamental and permanent.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks a comprehensive assessment of construction and pollution risks, failing to provide the necessary detail for evaluating potential environmental effects. Given the high-energy Atlantic environment, substantial seabed preparation and

installation works are proposed, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it lacks sufficient detail on prevention, control, and monitoring strategies.

Moreover, 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 ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential effects on marine species and habitats that are already recognised as sensitive in the broader assessment.

The concerns are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack 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 absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life lacks depth and fails to provide a thorough evaluation of ecological or 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 causing significant disruption.

A critical concern is the assumption that fishing activities can be displaced without consequences. The application does not supply evidence indicating that alternative fishing grounds are available, accessible, or capable of bearing additional pressure. This omission is crucial, as displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and livelihoods remain inadequately understood.

The proposal raises considerable risks for marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is expected to disturb marine life across considerable distances, affecting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There exists a clear inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This contradiction undermines the assessment's credibility and raises concerns regarding adherence to the Habitats Regulations, especially in cases where harm is anticipated at a level that necessitates legal authorisation.

Moreover, the assessment overlooks cumulative impacts arising 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 establish compliance with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which hinders any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents serious concerns regarding the integrity of its environmental assessment. The assessment of onshore infrastructure is materially incomplete, as it fails to consider the full extent of impacts from what is fundamentally a single integrated project. The offshore turbines and onshore works are intrinsically linked, yet they are evaluated separately, resulting in a fragmented approach that conceals the actual scale of environmental and socio-economic effects.

Key onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application does not offer a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

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

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been taken. This creates a significant evidential gap regarding biodiversity protection.

Moreover, the proposal raises alarm over carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that is at odds with the goals of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains positive.

The routing of infrastructure through active croft land introduces potential conflicts with existing 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 implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to assess the impact of aviation lighting on nocturnal wildlife and dark skies, which are critical to the area's environmental quality and tourism. The West Lewis coastline is known for its exceptionally dark skies, an important aspect of both cultural identity and tourism value. The introduction of permanent red aviation lighting will create a noticeable "wall of light" effect across the western horizon, significantly

altering the night-time environment.

Visual amenity, landscape character, and the experiences of residents and visitors have not been evaluated in relation to this lighting. The lack of consideration is particularly concerning because dark skies are vital to the area's identity and the developing sector of astro-tourism. This oversight creates a notable gap in the environmental impact assessment.

Furthermore, there is no evaluation of the effects of this lighting 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 collisions. The application does not include any lighting impact assessment or phototaxis study, which means it does not evaluate how this lighting could affect these species or increase their mortality rates.

The ornithological assessment relies solely on daytime survey data, failing to capture nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been considered. The absence of site-specific night-time data creates a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites could be adversely affected. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and obstructing a lawful determination.

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

Overall, the lack of any evaluation of dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

TOURISM

The application inadequately assesses the potential impacts on tourism, which is a vital component of the Isle of Lewis economy. Tourism is deeply rooted in the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted to the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the economic contribution of tourism.

This sector has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and representing up to 16% of

the island's economy. However, the application does not model how the industrialisation of the seascape and subsequent loss of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an essential and expanding sector.

Furthermore, the significance of environmental quality in promoting tourism is neglected. The unspoiled landscapes and dark skies are crucial for enhancing visitor experiences and for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and burgeoning part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent to the area have not been adequately addressed, contrary to the requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It also runs counter to strategic objectives that prioritise tourism as a growth sector, failing to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This shortfall hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is lacking.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as outlined by statutory duties, national policy, and evidential criteria. This application revisits the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is now presented under a strengthened policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data render the application inadequate and unreliable for determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of significant impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—result in an incomplete Environmental Impact Assessment. This incompleteness

obstructs a thorough understanding of likely significant effects and residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment is a material omission that hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal is also incompatible with National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural places, or cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, some of which are internally inconsistent, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to significant 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 the impacts on tourism are permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

I am horrified at the scale of the proposed wind farm. Inwll
Be unable to contine living on the island if it goes ahead. It will be unbearable.

It is inbeliebveable that the Scottish government can do this to the islanders. Absolutley disgusting.

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: 56F34EF7

Member of the public 1540

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed numerous material deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale, proximity, and design of the wind farm raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The employment of a flexible design framework hinders a clear understanding of likely significant effects. Additionally, the reliance on yet-to-be-defined mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There are notable and significant policy inconsistencies. The proposal appears to conflict 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 obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect 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 in this location, with large turbines located in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these findings, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability, failing to provide a comprehensive account of the anticipated environmental effects of the proposal. The flexible Project Design Envelope approach, which does not commit to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This uncertainty undermines the integrity of the assessment, meaning that the impacts outlined may not accurately represent the final development, thus preventing both the public and the competent authority from fully understanding the true extent of environmental effects.

The application depends substantially on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed at a later stage hinders any meaningful evaluation of their effectiveness or the 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 mandates that significant effects and mitigation measures are clearly established before any determination is made.

Furthermore, there are serious evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

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

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and robust assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally lacking and fails to offer a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is not only highly sensitive but also biologically active. However, the baseline data provided is incomplete, and the methodologies

used do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant shortfall pertains to otters, a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leaves unassessed the potential effects arising from construction disturbance, noise, and increased activity. This oversight weakens any conclusions drawn regarding the absence of significant effects on this species.

There are also notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are used frequently. The neglect to incorporate or adequately consider such data results in an incomplete baseline, thereby undermining the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are grounded in assumptions rather than on robust evidence. The lack of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a robust evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that seriously undermine its conclusions. This area on 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 demonstrate to the necessary evidential standard that these species will remain unaffected. The proposed development is sited within key foraging areas and migratory

pathways, yet the implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

A critical inconsistency exists within the application; the developer asserts 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 contradiction casts doubt on the reliability of the assessment and suggests that the conclusions drawn are unsupported by 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 not be negatively impacted. The importance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling approaches introduces uncertainty, especially concerning species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not fully understood.

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

From a regulatory viewpoint, the application does not satisfy the evidential threshold necessary to confirm 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, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, preventing a lawful conclusion that would support consent.

The identified deficiencies reflect a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing lacks the necessary transparency required for a lawful evaluation, thus rendering it materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap that obstructs both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the

developer’s own research.

Available summaries have indicated that local residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement, meaning they are not speculative. Yet, the absence of the full assessment limits proper scrutiny of these findings and hinders the evaluation of their significance in the decision-making process.

Furthermore, evidence suggests that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer’s findings. Despite this identification, such impacts have not been adequately integrated into the main application or given the appropriate weight. Consequently, withholding the complete Social Impact Assessment obscures the true 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 impacts is vital for developments of this scale, especially when community character and functionality may be at risk. The failure to provide the complete dataset results in the application lacking a robust evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence available indicates existing adverse effects that have not been adequately disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment provided regarding construction and pollution risks is notably deficient, lacking the essential detail needed to properly evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that

will only be developed after consent, which hampers any meaningful assessment of their adequacy or effectiveness.

The reliance on these vague future measures raises serious concerns, particularly due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it falls short in providing adequate details on how these risks will be prevented, managed, or monitored.

Furthermore, there is considerable uncertainty surrounding the magnitude and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether effective safeguards are available to address pollution incidents. This procedural risk weakens the competent authority's capability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the postponement of key environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is issued, and when such information is absent, a lawful determination cannot occur. Additionally, the application does not adequately demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment seriously flawed. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally inadequate, failing to address the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are inherently interconnected; however, they are assessed independently. This separation leads to a fragmented analysis that obscures the actual extent of environmental and socio-economic repercussions.

Included in the onshore works are components such as cabling traversing protected

moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavating areas of deep peat, particularly in Barvas Moor, which is crucial as a carbon store and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, hindering an accurate understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application impedes a proper analysis of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be evaluated collectively. The division between offshore and onshore components results in an incomplete comprehension of the combined consequences for peatlands, habitats, and local communities.

Additionally, there are significant threats to sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, thus creating a clear evidential void regarding biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, leading to a potential carbon debt that contradicts the aims of renewable energy development. The application falls short of sufficiently addressing this concern or proving that the overall carbon balance remains advantageous.

Moreover, routing the infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been initiated, casting doubt on the deliverability and lawful execution of the project.

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

When considered collectively, the separation of project elements, the absence of a comprehensive assessment, and the lack of substantiated evidence concerning environmental and land use impacts render this segment of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a crucial aspect of the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment and represents a significant concern.

Furthermore, the application does not address how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the local identity and to emerging sectors like astro-tourism, this oversight is considerable and creates a notable gap in the overall landscape and environmental assessment.

More importantly, there is no evaluation of the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study means the application fails to consider how aviation lighting might affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting; however, this vulnerability has not been examined. Without site-specific night-time data, there exists a significant deficiency in understanding the ecological impacts of the proposal.

The absence of an assessment regarding nocturnal impacts prevents the determination of whether protected species or designated sites could face adverse effects. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission is in conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape impacts since the night-time character is a vital element of the environment.

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

TOURISM

The Isle of Lewis tourism sector has seen significant growth, with its economic contribution 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 local economy. Despite this, the application fails to adequately assess the impacts of proposed large-scale offshore infrastructure on this vital sector. It acknowledges that 86% of visitors are drawn by the area’s stunning scenery, yet it does not quantify how industrial developments could affect visitor numbers, behaviours, or the overall economic contributions made by tourism.

Furthermore, the assessment does not consider the crucial role of environmental quality in enhancing the visitor experience, such as the significance of unspoiled landscapes and dark skies. The neglect of a Dark Skies Assessment leaves a substantial gap in understanding the impacts on emerging markets like nature-based tourism and astro-tourism, both of which are important for local economic sustainability.

In an island community with limited economic diversification, the lack of assessment regarding the impacts on tourism raises concerns for local employment, businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that the economic vulnerabilities of the area have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessary demonstration of net benefit. It contradicts strategic objectives that position tourism as a priority growth sector and lacks sufficient evidence for the competent authority to gauge the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis prevents 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 does not meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application brings forward the same core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis provided for the application. Critical baseline data is lacking, and the design envelope remains undefined. There is also an over-reliance on unspecified mitigation measures, with key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism effects, omitted from consideration. As a result, the Environmental Impact Assessment is incomplete and does not facilitate a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to disclose a complete Social Impact Assessment is a notable omission. These shortcomings hinder the competent authority's ability to evaluate the

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

The proposal contradicts the National Planning Framework 4. It does not demonstrate effective protection for biodiversity, natural landscapes, or cultural heritage. Furthermore, it fails to show that impacts on health and wellbeing are acceptable and lacks evidence of a net economic benefit, particularly due to missing tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring their implications for 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 with each other. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

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

In light of these issues, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I am a resident of Arnol on the West Side of Lewis and live here with my partner and young family (1 and 3 years old). I am objecting on the basis of the devestating impact that this innapropriate devlopment will have on the health and wellbeing of our island communities and the environmantal damage it will cause.

To recap:

The windfarm will devestate a unique marine environment that is exceptionally vulnerable and houses many species that are on endangered lists. It will have severe negative impacts on migration paths and habitats during construction and operation and cause irrepreble damage to the cold water corals on the seabed.

Add to this the effects of pollution through the leaching of chemicals, shards from the

blades and oil spills and it is easy to appreciate that this will be a disaster for local widlife.

The effects of infrasound from windfarms is an area of increasing concern, and this was unjustifiably scoped out of N4's EIA. Recent studies have shown correlation between high levels of infrasonic pollution and poor mental and physical health outcomes for local populations.

On land, the associated infrastructure of N4 will destroy peatland which is a natural carbon store and create additional pressures on local services and transport networks during its construction due to an influx of temporary workers.

Tourism, an essential part of the island economy will take a massive hit - the industrialisation of the island will deter visitors and have a detrimental effect on local businesses and livlihoods. The economics of N4 are not in favour of the people who live here, the jobs available will be mostly outsourced and the energy created will be exported with little to no room on the interconnector left for community projects. N4 is an extractive project, with profits funneled to foreign companies and investors, the definition of energy colonialism.

The level of anxiety caused by the proposal has already had a palpable effect on local communities, with many people considering leaving the island. The West Side is a stronghold of Gaelic culture and depopulation poses a threat to the viability of this indiginous community.

Visual effects of the turbines from blade flicker in front of the sun and blinking lights at night are an irritant and contribute to stress and poor menatl health. They will also destroy our dark skies through light pollution.

I am not a climate sceptic and am fully committed to a green future for Scotland but this proposal has been poorly thought through, vandalises the island and has no local benefit, I once again urge you to deny permission.

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: 05F575AC

Member of the public 1541

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental management, cultural considerations, and procedural compliance. Situated off the west side of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of the proposed development raise essential concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the available baseline information is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework impedes a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents any meaningful evaluation of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are significant policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines positioned alarmingly close to the shoreline. This introduces considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance highlight 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 is fundamentally lacking and fails to deliver a comprehensive, clear, or dependable account of the potential environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks defined turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders a consistent worst-case scenario evaluation. This deficiency compromises the integrity of the assessment, meaning the reported impacts may not accurately represent the development that is ultimately built. As a result, both the public and the competent authority are left without a true understanding of the environmental implications.

The application places a heavy emphasis on mitigation measures, monitoring strategies, and management plans that are not yet established. Consequently, consent is sought under the assumption that any environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of the effectiveness of these measures or assessment of remaining impacts. This postponement of critical information to post-consent phases is unacceptable and is at odds with the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly defined prior to decision-making.

Additionally, there are considerable evidential shortcomings, including inadequate baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case scenarios, introducing scientific uncertainty that is incompatible with statutory requirements.

Due to these issues, the application does not satisfy the evidential standards established under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and vulnerable habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, which includes stipulations for biodiversity protection and environmental integrity, as it fails to show that impacts have been thoroughly evaluated or that necessary safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and deficiencies in baseline data render the Environmental Impact Assessment Report untrustworthy and incomplete. These shortcomings obstruct a lawful and thorough appraisal of environmental effects and leave the competent authority unable to make a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that is severely lacking in a thorough assessment of alternatives, which is crucial under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives with respect to their environmental consequences, it presents a narrative

regarding the evolution of the project. This method does not adequately show that options which could potentially cause less harm have been appropriately identified, evaluated, and chosen over more damaging alternatives.

There is a concerning absence of transparent, evidence-based comparisons for different offshore locations, development scales, or design configurations. Notably, the application does not provide evidence that the developer has genuinely considered placing turbines further from the shore, where the impacts—ecological, visual, and coastal—would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical role that distance from shore plays in determining the impact, the failure to conduct such an analysis undermines any assertion that the proposed location is the least damaging.

These shortcomings extend to the assessment of cable routing and landfall. There is inadequate evidence that alternative routes have been sufficiently explored to mitigate or avoid effects on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy for avoidance and comparative analysis suggests a reliance on post-design mitigation measures rather than the application of mitigation through design.

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

From a policy standpoint, this inadequacy detracts from compliance with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that further supports the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks comprehensiveness, failing to deliver a reliable overview of the ecological receptors in the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, classified as a European Protected Species. The application neglects to appropriately identify and assess their use of

coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction-related disturbances, noise, and increased human activity have not been adequately analysed. As a result, this compromises any conclusions drawn about the absence of significant effects on this species.

In addition, the evaluation of basking sharks is hindered by reliance on aerial surveys, which can introduce substantial detection bias, particularly under challenging Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to integrate or properly consider such relevant data culminates in an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological shortcomings outlined lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. Moreover, the lack of adequate baseline data obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty about the actual scale of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an insufficient identification and assessment of protected species. This uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

When considered collectively, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, with major gaps in evidence and inconsistencies that undermine its conclusions. The application does not satisfactorily 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. This development is sited within critical foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

There is a fundamental contradiction in the application; the developer claims no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This

inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the evidence presented. The assessment fails to provide convincing evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. Moreover, the methodologies utilised likely underestimate mortality, particularly given the incomplete baseline data and the insufficient understanding of behavioural responses.

The proposed placement of turbines within a recognised migratory corridor presents an additional and considerable risk, effectively obstructing a primary flight path used by species travelling 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 will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations of the 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 in favour of consent.

Additionally, these identified deficiencies signify a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not face adverse effects places the proposal in direct contradiction with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of adequate evidence. These deficiencies hinder a comprehensive evaluation of impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. The evaluation adopts a narrow perspective, viewing heritage merely as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practice; however, they have been classified as static features within the assessment. This mischaracterisation neglects their

continued use and meaning, as well as the effects of development on their settings, leading to an incomplete analysis of cultural impacts and overlooking their role in community life.

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including 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 and are conspicuously missing from the assessment, constituting a major oversight. The failure to consider these factors inhibits a comprehensive understanding of the development's cultural impact.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity recognised as that of an Indigenous People. However, the absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and disregards established principles for participation in decisions that affect cultural and environmental matters.

A significant procedural error is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic repercussions on the island community. This alone compromises the legality of the determination process.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to recognise living cultural practices represent a clear deviation from the stipulated policy requirements.

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory responsibilities culminates in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application does not offer a sufficient foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has not published the full Social Impact Assessment despite having commissioned it, which has resulted in a significant evidential gap. This lack of transparency hinders both the public and the competent authority from gaining a comprehensive understanding of the social risks identified in the developer's own research. While summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity, the failure to disclose the complete assessment limits the ability to scrutinise these findings thoroughly.

Moreover, the proposal is viewed by some as a direct threat to community identity and cohesion, with the developer acknowledging “cultural loss” within their findings. Unfortunately, these critical impacts have not been adequately integrated into the main application or weighted appropriately. The absence of the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This situation undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may alter community character and functioning. The lack of a complete dataset means the application does not provide a full evidential basis for evaluating the balance between potential benefits and harms.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and avoid harm; however, available evidence suggests existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy becomes unfeasible.

The procedural implications are considerable. The competent authority is unable to perform a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This material omission signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the complete Social Impact Assessment and evidence of existing adverse impacts renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and leads to the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, landscape, and seascape is significantly inadequate and does not capture the full extent of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The placement of large-scale turbines in close proximity to the shore would introduce a persistent and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application falls short in illustrating the extent of this visual alteration. Due to the scale and closeness of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would adversely affect visual amenity and diminish the key qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact nor its importance in the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual

viewpoints. Evidence indicates that the chosen viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This risk suggests that the visual impact has been understated, calling into question the assessment's reliability.

Another significant shortcoming is the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked visually and spatially to the Atlantic horizon. The assessment treats these assets in isolation, failing to acknowledge their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are appreciated 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 thoroughly examined within the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 in terms of preserving natural places and historic assets. The magnitude of change contradicts the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

Overall, the assessment inadequately conveys the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks essential details for assessing construction and pollution risks, failing to meet the necessary standards for evaluating likely environmental impacts. It involves significant seabed preparation and installation work in a high-energy Atlantic environment, yet no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans have been submitted. Instead, the application depends on unspecified mitigation and contingency measures to be developed after consent, which obstructs any meaningful assessment of their effectiveness or adequacy.

This reliance on undefined future measures is particularly alarming due to the

sensitivity of the West Lewis coastline, known for its clean coastal waters and crucial habitats that are susceptible to sediment disturbance and pollution. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it does not furnish adequate information on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application hinders the evaluation of whether proper safeguards are established to address pollution incidents. This approach introduces procedural risk and weakens the ability of the competent authority to review environmental protection measures before making a determination.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination is unachievable. Additionally, the application fails to demonstrate compliance with policy standards concerning environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment fundamentally deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life in the application is insufficient and fails to provide a robust evaluation of ecological or socio-economic impacts. It does not convincingly demonstrate that these essential uses and habitats can be preserved without significant disruption.

One major concern is the flawed assumption that fishing activity can be displaced without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds capable of accommodating the additional pressure. This significant omission raises the risk of overfishing in different areas, potentially leading to wider economic repercussions for the local fishing fleet. Without a comprehensive and evidence-based assessment, the impacts on fisheries and the livelihoods they support cannot be accurately understood.

The proposal also presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling that would take place over an extended period is likely to disturb marine life across vast distances, with potential effects on species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application diminishes the significance of these effects without adequate supporting evidence.

There is a contradiction within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially when harm is anticipated at a level that requires legal authorisation.

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

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of impacts on marine life and fisheries, necessitating immediate and decisive action to address these critical issues.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant concerns due to the incomplete assessment of onshore infrastructure, which fails to address the full range of impacts from what is a single integrated project. The offshore turbines and onshore works are interconnected, yet their evaluation occurs separately, creating a disjointed approach that obscures the true extent of environmental and socio-economic effects.

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The application does not provide 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 a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be reviewed collectively; however, the separation of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application falls short in demonstrating that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented, resulting in a notable gap in evidential support regarding biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that necessary consents or processes have been initiated, prompting 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 show that impacts can be avoided or mitigated further diminishes the application’s credibility.

In summary, the separation of project components, 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 proposed application neglects the assessment of dark skies and nocturnal wildlife, which is a significant omission from the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The importance of maintaining dark skies is particularly relevant to the area's identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts highlights a significant gap in the overall landscape and environmental assessment.

In addition, there is a critical absence of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application does not provide a lighting impact assessment or a phototaxis study, resulting in an inadequate assessment of how aviation lighting might affect these species or potentially raise mortality rates.

This omission is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

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

In summary, the absence of assessments regarding dark skies and nocturnal wildlife leads to a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts 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 proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed when assessed against statutory duties, national policy, and evidential standards related to sustainable development. It echoes the key issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This current application is made under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

The evidential basis for this application is incomplete and unreliable. Critical gaps exist in the baseline data, there is reliance on an undefined design envelope, and mitigation measures are unspecified. Additionally, key impacts such as those on nocturnal wildlife, full onshore infrastructure, and tourism effects have been omitted. As a result, the Environmental Impact Assessment falls short and does not provide a clear picture

of likely significant effects or any residual impacts.

There are procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, not fully disclosing the Social Impact Assessment is a material omission. These gaps 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 is at odds with National Planning Framework 4. It does not show evidence of protecting biodiversity, natural places, or cultural heritage. There is also no assurance that health and wellbeing impacts are acceptable, nor is there evidence of a net economic benefit since tourism impact modelling is absent. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, leaving effects on peatlands, carbon balance, habitats, and crofting land obscure.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals lack completeness and contain inconsistencies. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion on 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, disruptions to cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be effectively mitigated.

In conclusion, the application is unfit for determination both procedurally and substantively. The volume of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should refuse consent for this application or utilise the appropriate regulatory measures to mandate the submission of the necessary 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

Scotland cannot continue to have this devastating industrialisation forced upon us.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C49A13E8

Member of the public 1542

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and proximity of the proposed turbines raise significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly given the unprecedented nature of this development in the area.

The application lacks sufficient evidential support for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, reliance on unspecified mitigation measures means their effectiveness cannot be evaluated, resulting in documentation that does not provide a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects are not substantiated by robust evidence.

There are substantial policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to show compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the proposal's acceptability in policy terms.

Taken together, the absence of adequate information, the reliance on undefined mitigation measures, and the evident policy non-compliance highlight that the application is incomplete. In these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent overview of the expected environmental effects of the proposed project. The employment of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and hinders the application of a worst-case scenario analysis.

This deficiency compromises the assessment's integrity, resulting in a lack of clarity for both the public and the competent authority regarding the actual environmental impacts that may arise from the development.

Furthermore, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under such circumstances implies that environmental harm will be rectified post-approval, thus obstructing any substantive evaluation of the efficacy of these measures or the assessment of residual impacts. This postponement of essential information to a later stage not only contravenes the procedural norms but also undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be adequately detailed before a decision is made.

There are also critical evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are presented without strong supporting data. The lack of adequate information results in an unclear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects with reasonable scientific certainty. This invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been thoroughly assessed or that suitable safeguards are in place regarding biodiversity protection and environmental integrity.

In summary, the combination of 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 impede a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It does not provide a reasoned comparison of realistic alternatives based on their environmental effects but instead presents a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a noticeable absence of transparent comparisons concerning alternative

offshore locations, development scales, or design configurations. Specifically, the developer has not shown that they have seriously considered positioning the turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, as well as the critical role of proximity to shore in assessing impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies in the application also extend to the assessment of cable routing and landfall, revealing insufficient evidence that alternative routes have been thoroughly examined to avoid or mitigate impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis demonstrates that mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This shortcoming reflects a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors within the West Lewis coastal environment. This region constitutes a highly sensitive and biologically rich marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active utilisation of coastal regions for foraging and movement. The disregard for their core foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and heightened activity remain inadequately assessed. This oversight seriously undermines any conclusions regarding the absence of significant effects on this species.

Further shortcomings are apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to include or appropriately consider such vital data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are predicated on assumptions rather than robust evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the actual 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 and National Planning Framework 4, as protected species have not been identified or assessed in a thorough manner. The introduced uncertainties prevent the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented within the application is fundamentally flawed, characterised by significant evidence gaps and internal contradictions that fundamentally undermine its conclusions. A notable contradiction arises from the developer's assertion that there will be no significant adverse effects, even as they pursue a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will remain unaffected. The siting of turbines within recognised migratory corridors creates a substantial risk, as it introduces a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. Furthermore, the assessment does not thoroughly evaluate the long-term consequences of sustained mortality within this

corridor or the potential impacts on species with relatively small global populations.

Moreover, the assessment lacks sufficient evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches adds uncertainty, particularly for species in severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is incomplete and behavioural responses are not fully understood.

From a regulatory standpoint, the application fails to meet the evidential threshold required to determine no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and precludes a 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 convincingly demonstrate that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these weaknesses render the assessment unreliable and inhibit a thorough evaluation of impacts, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally lacking and does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. This application employs a simplistic approach, viewing heritage merely as a collection of discrete, unchanging assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

One significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment regards them as static features, overlooking their continued significance and the potential impact of development on their context. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance in community life.

Additionally, the application does not consider intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity but are completely omitted from the assessment, marking a considerable gap. Without addressing these factors, the cultural implications of the development cannot be accurately evaluated.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinctive cultural identity that aligns with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement diminishes the validity of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental concerns.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and sites. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, represents a clear violation of policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and poses significant risks to our community's health, wellbeing, and identity. While the developer engaged local residents through focus groups, the failure to publish the complete report creates a substantial evidential gap. This absence not only limits public understanding but also hampers the competent authority's ability to gauge the full spectrum of social risks identified in the developer’s own research.

Residents are already feeling the weight of this proposal, experiencing measurable stress, anxiety, and concern due to its scale and proximity. These effects are grounded in direct engagement, thereby reinforcing their legitimacy. Yet, without access to the full assessment, the findings remain shrouded in ambiguity, obstructing proper scrutiny and the evaluation of their significance in the decision-making process.

Moreover, there is clear evidence that this proposal is perceived as a threat to community identity and cohesion, with concerns about "cultural loss" arising from the developer's findings. Unfortunately, these critical impacts have not been adequately integrated into the main application nor afforded the necessary weight in the evaluation process. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude. The decision-making process requires a complete evidential basis to assess the balance between the benefits and potential harms of the proposal.

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 mitigate harm, yet the evidence suggests existing adverse effects that have not been fully disclosed. Consequently, the absence of the full assessment makes it impossible to demonstrate compliance with this policy.

The implications of this omission are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment. This represents a material flaw in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leaves the evaluation incomplete and unreliable. This ultimately undermines the lawful determination of the application, highlighting that it lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines near the West Lewis coastline presents significant shortcomings in the assessment of seascape, landscape, and visual impacts. This coastline, characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness, would face fundamental alterations due to the introduction of an industrial presence in close proximity to the shoreline. Such a transformation is not only significant but also permanent and irreversible, fundamentally changing the landscape character.

The application inadequately portrays the extent of visual change, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and compromise the essential qualities of naturalness and remoteness that define the area. The current assessment fails to capture the severity of this impact or its importance within the context of such a sensitive landscape.

Methodological issues are also evident in the selection and presentation of visual viewpoints. It appears that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises concerns that the assessment may have understated the magnitude of visual impacts, thereby questioning the reliability of the findings.

Moreover, the assessment does not consider the interconnected nature of landscape, seascape, and cultural heritage. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded within a broader landscape context that relies on visual and spatial links to the Atlantic horizon. By treating these assets as separate entities, the assessment overlooks their interdependence, leading to an incomplete analysis of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This results not only in a visual impact but also in broader cultural and spatial harm, which the application has not sufficiently evaluated.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of the proposed changes is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any claims of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. As such, the anticipated changes represent a fundamental and permanent alteration that cannot be lessened to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal fails to provide a comprehensive assessment of construction and pollution risks, making it impossible to evaluate the likely environmental effects accurately. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that would be prepared after consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly alarming given the sensitive nature of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and the possibility of chemical or oil spills, it does not adequately detail how these incidents will be prevented, controlled, or monitored.

Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also affects the potential consequences for marine species and habitats already recognised as sensitive in the broader assessment.

The absence of detailed emergency response procedures only exacerbates these issues. By delaying contingency planning until after consent, the application obstructs a proper evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and without such information, a lawful determination is unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts makes the assessment materially deficient. These deficiencies preclude a thorough evaluation of construction and pollution risks and further emphasise that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life associated with the application is inadequate, lacking a thorough evaluation of ecological and socio-economic impacts. A significant flaw is the assumption that fishing activity can be displaced without consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure. This lack of information is critical, as the risk of displacement could lead to overfishing elsewhere, potentially resulting in wider economic repercussions for the local fleet. Consequently, without a clear, evidence-based assessment, the effects on fisheries and livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life across substantial distances, with particular implications for species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application tends to minimise these effects without sufficient supporting evidence.

There exists a troubling inconsistency within the application, as it acknowledges the

necessity of licences to permit harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where harm is expected to an extent that requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions is not possible.

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 current marine users or avoid unacceptable impacts on marine biodiversity, thus precluding any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments that are safeguarded by policy. The application

fails to prove that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, highlighting a clear evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical oversight. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting, visible across long distances, would create a continuous and intrusive effect on the western horizon, fundamentally altering the night-time landscape.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the region's identity and the burgeoning sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these impacts highlights a substantial gap in the overall landscape and environmental assessment.

Equally alarming is the failure to assess impacts 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 behaviour, which may lead to disorientation and an increased risk of collision. The application does not include any evaluation of lighting impacts or a study on phototaxis, resulting in a lack of understanding regarding how aviation lighting could affect these species or contribute

to increased mortality rates.

This oversight is exacerbated by the use of daytime survey data in the ornithological assessment, which neglects to capture nocturnal activities and associated risks. Other species, like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been adequately assessed. The absence of site-specific night-time data creates a significant void in understanding ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites may face adverse impacts. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, thus engaging the precautionary principle and obstructing a lawful determination.

From a policy perspective, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. Moreover, they undermine the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall ecosystem.

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

Additional Comments

This proposal should not go ahead. The islands cannot cope with the additional strain to services this attempt at industrialistion will cause. The destruction of wildlife and precious beautiful untouched locations and the impact on tourism will be untold. Nobody will come to visit our island and this will have dramatic effects on the local economy. Green energy is important, however this particular project is unjust and makes no sense at all. These are the worlds biggest wind turbines and a foreign company with no investment in the UK or Lewis wants to put them 5km from the UKs most wildlife dense shores, which was changed without any public consultation. The breaches in policies for this specific application is too many to disregard.

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: 725C92FF

Member of the public 1543

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which fundamentally challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application does not provide an adequate evidential basis for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Additionally, many aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to support an informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Furthermore, there are notable policy conflicts, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts undermine the ability of the competent authority to determine that the development is acceptable within the required policy framework.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance highlight that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, leading to an unreliable account of the likely environmental effects associated with the

proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations. This creates uncertainty and hinders the assessment of a worst-case scenario. Consequently, the integrity of the evaluation is compromised, making it difficult for the public and the competent authority to comprehend the true environmental impacts.

Moreover, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent based on the premise that potential environmental harm will be addressed later prevents any substantial evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of critical information to post-consent stages contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly outlined before determination.

There are also notable evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This lack of robust supporting data results in uncertainty regarding the magnitude and significance of impacts, especially in instances where negligible or non-significant effects are asserted. The inadequacy of information hinders a proper understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential threshold needed under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with the National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that appropriate safeguards exist.

In conclusion, the combination of reliance on an undefined design envelope, absence of defined mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These shortcomings prevent 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 evaluation of alternatives provided in the application is significantly deficient and does not satisfy the legal obligations set forth by the Environmental Impact Assessment framework. Instead of offering a coherent and analytical comparison of viable alternatives based on their environmental implications, the submission presents a narrative detailing the development's progression. This method inadequately demonstrates that less detrimental options have been thoroughly identified, evaluated, and chosen over more harmful alternatives.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to provide a comprehensive understanding of ecological receptors in the West Lewis coastal environment. This area is sensitive and biologically active, yet 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 solid evidential basis for evaluating potential impacts.

One major oversight concerns otters, which are a European Protected Species. The application does not appropriately recognise or assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the possible impacts of construction disturbance, noise, and increased activity have not been adequately evaluated. This significantly weakens any conclusions drawn about the absence of significant effects on this species.

There are also serious shortcomings in the assessment of basking sharks. Relying on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The neglect to incorporate or properly consider such relevant data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out in the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking 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 shortcomings prevent a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is significantly flawed, exhibiting gaps in evidence and inconsistencies that diminish its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Situated within crucial foraging areas and migratory pathways, the proposed development does not adequately assess the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the supporting evidence. The assessment lacks sufficient information to conclude that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling techniques adds a layer of uncertainty, especially for species

experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given incomplete baseline data and a lack of understanding regarding behavioural responses.

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

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, combined with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent. The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to its internal contradictions, methodological flaws, and insufficient evidence. These shortcomings impede a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community interweave. The application adopts a narrow perspective, viewing heritage as a collection of isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active sites of burial and spiritual practice are mischaracterised as static features, with the assessment neglecting their continued use and meaning, as well as the impact that development could have on their setting. This inadequate representation leads to an incomplete understanding of cultural effects and disregards their role in community life.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and traditions, as well as the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are completely omitted from the assessment, which represents a significant lapse. Without the consideration of these factors, one cannot adequately

grasp the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement questions the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical procedural failure is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone hinders lawful determination.

From a policy standpoint, these inadequacies place the proposal in clear conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a significant departure from policy requirements.

In summary, the failure to consider living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application presents a materially deficient assessment of social impacts, health, and wellbeing, lacking the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the full report has not been released. This represents a significant evidential gap that hinders both public understanding and the competent authority's capacity to grasp the full extent of social risks highlighted by the developer's research.

Evidence suggests that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, which stems from direct engagement rather than speculative assertions. Nevertheless, without disclosure of the complete assessment, proper scrutiny of these findings is obstructed, limiting the evaluation of their significance in the decision-making process.

Moreover, there is a prevailing perception that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” identified as a concern in the developer’s own findings. Despite this acknowledgment, the impacts have not been adequately integrated into the main application nor given due consideration. The

withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency poses challenges to the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly those that may affect community character and functioning. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is imperative that development supports positive health outcomes and mitigates harm. The existing evidence indicates adverse effects that remain undisclosed, thereby hindering the demonstration of compliance with relevant policy.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material failure within the application, failing to meet the evidential standards required by the Environmental Impact Assessment framework.

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 deficiency impedes a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines close to the West Lewis coastline threatens to fundamentally alter the character of this sensitive environment. This area is characterised by its open Atlantic horizon, undeveloped landscape, and strong sense of remoteness. The introduction of such industrial structures would create a continuous and dominant presence along the shoreline, leading to a permanent and irreversible transformation of the landscape.

The assessment provided does not sufficiently reflect the magnitude of the visual changes anticipated. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the region. The assessment fails to convey the true level of impact and its significance, given the sensitivity of the landscape involved.

Moreover, there are notable methodological shortcomings in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the potential visual impact has been underestimated, which

undermines the reliability of the overall assessment.

Another critical gap is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their surroundings, with visual and spatial relationships tied to the Atlantic horizon. Treating these sites as isolated entities fails to acknowledge their interdependence, leading to an incomplete assessment of the impacts on their setting and cultural significance.

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

From a policy standpoint, this proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The anticipated scale of change contradicts the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case assessment further undermines any claims of compliance with policy.

The detrimental impacts identified cannot be adequately mitigated. The scale, height, and proximity of the turbines ensure their presence would be both dominant and unavoidable. Consequently, the change is fundamental and permanent, resistant to reduction through mitigation measures.

In conclusion, the assessment does not accurately represent the extent of the impact, the sensitivity of the environment, or the interconnectedness of the landscape and heritage. These inadequacies 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 sufficient detail regarding construction and pollution risks, leaving the assessment incomplete and unable to adequately evaluate the likely environmental effects. It involves significant 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 formulated after consent has been granted, which hampers any meaningful assessment of their effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential accidental chemical or oil spills, it falls short of providing enough detail on how these incidents will be prevented, controlled, or monitored.

Uncertainty also surrounds the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been recognised as sensitive within the wider assessment.

Moreover, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application restricts the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent, and the lack of such 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 failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application 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.

TOURISM

The assessment of tourism impacts associated with the proposed development is significantly lacking, failing to adequately 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, near-pristine landscapes, dark skies, and the overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has experienced considerable growth, with revenue increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. Nonetheless, the application falls short by failing to model the potential impacts of industrialising the seascape and the resultant loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Furthermore, the assessment neglects to consider the critical role of environmental quality in enhancing the tourism experience, particularly the value of unspoiled landscapes and dark skies to visitors, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this

issue, creating a substantial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to examine the implications for tourism raises broader concerns regarding employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposed development.

Collectively, the failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependency result in a notable evidential gap. This lack of comprehensive evaluation undermines the ability to draw robust conclusions about the economic effects of the proposal and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. It echoes the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant shortcomings in the evidential basis provided for determination. Critical gaps exist in baseline data, and the use of an undefined design envelope raises further concerns. The application relies on unspecified mitigation measures and omits crucial impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to adequately convey the likely significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment is a notable omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts directly with National Planning Framework 4. It does not

demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, nor does it sufficiently address health and wellbeing impacts or prove a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been assessed thoroughly, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts can be deemed acceptable.

Moreover, the proposal is set to cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism are all permanent effects that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful, evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or enforces the relevant regulatory measures to obtain the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is rejected in its entirety.

Additional Comments

These Islands rely on Tourism and the natural beauty of the Islands would be destroyed or significantly affected. Also the natural resources of these Islands belong to the people and should not be taken, altered or used in any way that id detrimental to the local people and environment. The proposal for this development does not protect or improve the social and environmental fabric of our Islands. Any economic benefits would be entirely for profit of huge multinational companies and their shareholders. Any developments of this type should be owned and operated by local communities.

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: E15B9948

Member of the public 1544

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 frameworks. It highlights significant deficiencies in material planning, environmental, cultural, and procedural aspects based on a review of the Environmental Impact Assessment Report and its supporting documentation. 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 identity. The proposal's scale, proximity to the shoreline, and design raise serious concerns about its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, with limited and inconsistent baseline information and several key elements of the proposal remaining undefined. The reliance on a flexible design framework obstructs a clear assessment of likely significant effects, while the unspecified mitigation measures mean that their effectiveness cannot be evaluated. Consequently, the existing documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence to support them.

There are evident and substantial policy conflicts within the application. It seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The proposal does not sufficiently demonstrate that it can meet national obligations to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests required for consent and undermine the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact due to the large turbines being placed in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy further illustrates 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 Environmental Impact Assessment Report presents several significant deficiencies that undermine its reliability and completeness. Notably, the proposal's use of a flexible Project Design Envelope lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces uncertainty and obstructs the application of a worst-case scenario, consequently compromising the integrity of the assessment. As a result, the presented impacts may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from fully grasping the extent of environmental effects.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is seriously lacking. This region is known for its sensitivity and biological activity, yet the baseline data presented is inadequate. The methodologies employed do not sufficiently capture the presence, behaviour, or habitat usage of key

species, leading to a lack of reliable evidence for evaluating potential impacts.

In particular, there is a significant oversight regarding otters, classified as a European Protected Species. The application fails to properly acknowledge their active utilisation of coastal areas for foraging and movement. As a result, the assessment does not adequately consider their core foraging range and behaviour, leaving the potential impacts of construction disturbances, noise, and increased activity inadequately evaluated. Consequently, any claims regarding the absence of significant effects on otters are fundamentally undermined.

Furthermore, the assessment of basking sharks is flawed due to an overreliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic weather conditions. This methodology likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The disregard for such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on mere assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful analysis of cumulative and indirect impacts, including seasonal changes and interactions within the broader ecosystem. This introduces uncertainty about the actual risks 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. The proper identification and assessment of protected species are notably absent. The resulting uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment conducted on cultural heritage and community identity is fundamentally inadequate, failing to acknowledge the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a reductive approach, treating heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These cemeteries serve as active places of burial and spiritual practice; however, the assessment categorises them as static features, overlooking their continued use and significance, as well as the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the cemeteries' essential role in community life.

Moreover, there is a lack of consideration for intangible cultural heritage, including the Gaelic language and local traditions, alongside the longstanding connection between the community and the coastal environment. These elements are critical to the area's identity but are entirely omitted from the assessment, indicating a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity recognised as characteristic of Indigenous Peoples, has not undergone any process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and does not reflect the established principles of participation in decisions that impact cultural and environmental interests.

Another significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment obstructs the competent authority's ability to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone hampers a lawful determination.

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 oversight of both tangible and intangible heritage, alongside a failure to recognise living cultural practices, represents a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment is a serious concern that undermines the evaluation of social impacts, health, and wellbeing related to this development proposal. Although the developer engaged local residents through focus groups, the full report has not been made available, creating a significant evidential gap. This lack of transparency hinders both the public and the competent authority from grasping the full extent of the social risks identified in the developer's own research.

Available summaries reveal that local residents are already feeling stress, anxiety, and concern as a result of the proposal's scale and proximity. These effects arise from direct engagement and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the ability to assess their importance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with “cultural loss” explicitly noted in the developer’s findings. Despite this critical information, the impacts have not been adequately integrated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A thorough understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they may affect community character and functioning. By failing to provide the full dataset, the application lacks a comprehensive evidential basis for weighing benefits against potential harm.

From a policy perspective, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential criteria of the Environmental Impact Assessment regime.

Collectively, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed development is severely lacking and does not sufficiently acknowledge the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The addition of large-scale turbines near the shoreline would create a consistent and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that cannot be reversed.

Moreover, the application fails to accurately depict the magnitude of the visual change.

The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining qualities of naturalness and remoteness. This level of impact and its significance in such a sensitive landscape has not been properly conveyed in the assessment.

Concerns also arise regarding the selection and representation of visual viewpoints within the methodology. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the assessment's reliability.

Another critical shortcoming is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The level of change proposed is incompatible with the mandate to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

Overall, the assessment inadequately represents the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to properly assess construction and pollution risks, resulting in an incomplete evaluation of likely environmental effects. It entails significant seabed preparation and installation work in a challenging Atlantic environment, yet fails to provide comprehensive Construction Environmental

Management Plans or Pollution Prevention Plans. Instead, it depends on undefined mitigation and contingency measures that are set to be developed post-consent, which restricts the ability to meaningfully evaluate their effectiveness or adequacy.

This approach raises serious concerns, particularly due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not adequately address how these incidents will be prevented, controlled, or monitored.

There is considerable uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to the potential consequences for marine species and habitats that have already been identified as vulnerable within the wider assessment.

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

From a regulatory standpoint, the delay in implementing essential environmental safeguards contravenes the Environmental Impact Assessment requirements. It is imperative that likely significant effects and mitigation are evaluated prior to consent; any deficiencies in this information prevent a lawful determination. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts leads to a materially deficient assessment. These significant shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

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, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Nonetheless, the application does not model the potential impacts of the industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would yield a net economic benefit or detract from a well-established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this deficiency, leaving a considerable gap in the understanding of impacts on a recognised and growing part of the local economy.

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

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the requisite to demonstrate net benefit. It conflicts with strategic objectives identifying tourism as a priority growth sector and does not furnish sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This undermines the ability to conduct a rigorous 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 when evaluated against statutory duties, national policy, and evidential standards. It mirrors the key concerns that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Notably, this current application is submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

The evidential foundation for the proposal is neither complete nor dependable. There are significant gaps in baseline data, an undefined design envelope is being utilised, and there is reliance on unspecified mitigation measures. Moreover, critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism, have been omitted. As a result, the

Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Clear procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4 by failing to demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It does not show that the health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is procedurally and substantively unfit for determination. The scale of deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or activate the relevant regulatory measures to obtain the missing information.

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

Additional Comments

I believe this scheme to be too big, to close and will ruin the beauty of the West coast of Lewis. It may offer initial construction jobs but in the long run the community will be worse off overall and is not going to be a place where people will want to return home to or bring up families. If these monolith's were fewer and further out I may be more supportive but I think this scheme takes the community for granted.

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: 8F0D485C

Member of the public 1545

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 regimes. My concerns stem from a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is to be situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale, proximity, and design of this proposal raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application is deficient in providing a solid evidential foundation for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many essential aspects of the proposal remain undefined. The flexible design framework employed complicates an accurate assessment of likely significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust evidence to support them.

There are significant conflicts with established 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 habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national standards aimed at safeguarding biodiversity, climate objectives, and environmental integrity. Such conflicts directly affect the statutory tests necessary for granting consent and impair the competent authority's ability to conclude that the development aligns with policy requirements.

The unprecedented scale of this proposal, with large turbines positioned dangerously close to the shoreline, raises major concerns about landscape capacity, visual dominance, and environmental repercussions. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and does not deliver a comprehensive, transparent, or dependable evaluation of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, which compromises the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that will ultimately be constructed, leaving both the public and the competent authority unable to grasp the true extent of the environmental consequences.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Consequently, consent is sought on the premise that any environmental harm will be addressed at a later date. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

There are also substantial evidential shortcomings, which include gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions asserting negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential standards 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, which includes obligations related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority without the necessary information to make an informed determination on the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based comparison of alternative offshore locations, development scales, or design configurations, failing to demonstrate that the developer has adequately considered less harmful options. This

raises significant concerns regarding the assessment of alternatives, which does not fulfil the statutory requirements of the Environmental Impact Assessment regime. The absence of a transparent analysis prevents any conclusion that the proposed siting represents the least damaging option, particularly given the sensitivity of the West Lewis coastline where proximity to shore is crucial in determining impact.

Moreover, the assessment deficiencies extend to cable routing and landfall evaluation. There is inadequate evidence that alternative routes have been explored to mitigate impacts on sensitive receptors, including culturally significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis highlights that mitigation by design has not been employed, instead relying on post-design mitigation measures.

As a consequence, the application fails to demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This situation constitutes a breach of the established mitigation hierarchy, preventing the competent authority from determining the existence of more appropriate alternatives. The overall deficiencies further undermine compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. Ultimately, the inadequate assessment undermines the application's validity and its potential to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, lacking a comprehensive understanding of ecological receptors within the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet it is evident that the baseline data provided is incomplete. The methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat utilisation, leading to an unreliable evidential basis for evaluating potential impacts.

One notable gap in the assessment pertains to otters, classified as a European Protected Species. The application does not properly acknowledge or evaluate their active use of coastal regions for foraging and movement. By failing to consider their core foraging range and behavioural habits, the assessment inadequately addresses the potential impacts of construction-related disturbances, noise, and increased activity, undermining any assertions regarding the absence of significant effects on this species.

Further issues are apparent in the evaluation of basking sharks, where a reliance on aerial surveys introduces substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations, which indicate a frequent utilisation of these waters. The oversight of relevant data leads to an incomplete baseline, diminishing the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions that suggest negligible or non-significant effects appear to be based on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates a level of uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to align with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not appropriately identify or assess protected species. This introduction of uncertainty prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This region supports many seabird species that are already in decline, yet the ornithological assessment provided is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately evaluate the implications of habitat loss, displacement, or collision risk, despite the development being situated within key foraging areas and migratory pathways.

A fundamental contradiction exists in the application, where the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This approach is only necessary when significant harm is anticipated, which raises serious doubts about the reliability of the assessment. It suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial importance of these feeding grounds is inadequately addressed, and the reliance on modelling methods introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of the birds are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a significant 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 have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations been adequately 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, along with data gaps and limitations in the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in favour 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. Overall, 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 collectively lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing significantly undermines the evaluation process. The developer has commissioned a Social Impact Assessment, which included focus groups with local residents, but has not published the full report. This omission creates a major evidential gap and obstructs the public and the competent authority from fully understanding the social risks highlighted by the developer's research.

Available summaries reveal that residents are already experiencing noticeable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not merely speculative. However, the failure to release the complete assessment hinders proper scrutiny of these findings and restricts the ability to gauge their importance in the decision-making process.

Additionally, there is evidence suggesting that the proposal threatens community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this, the application has not fully considered these impacts or given them adequate weight. By withholding the complete Social Impact Assessment, the true social and human costs associated with the development remain obscured.

This lack of transparency also compromises the Environmental Impact Assessment process. To fully understand the social, economic, and health impacts of developments of this magnitude, especially when community character and functioning are at stake, a comprehensive assessment is essential. The application does not present a complete evidential basis for weighing the benefits against the

potential harm due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development must promote positive health outcomes and avoid negative effects, yet the available evidence suggests existing adverse impacts that have not been adequately disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications of this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission is a material failure within the application and does not meet the evidential requirements set by the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Additionally, there is a notable failure to evaluate the intertwined relationship between landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the wider landscape through visual and spatial connections to the Atlantic horizon. The

assessment incorrectly treats these sites as isolated entities rather than acknowledging their interrelatedness, resulting in an incomplete understanding of how impacts affect their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies regarding the assessment of construction and pollution risks, which ultimately impedes a thorough evaluation of potential environmental effects. It involves considerable seabed preparation and installation activities in a high-energy Atlantic setting. However, it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent, making it impossible to assess their adequacy or effectiveness.

Moreover, the reliance on undefined future measures raises considerable concerns due to the vulnerability of the receiving environment. The West Lewis coastline is characterised by 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 spills of chemicals or oil, it does not provide adequate information on how these risks will be prevented, controlled, or monitored.

Further complicating the situation is the uncertainty regarding the scale and behaviour

of sediment plumes resulting from seabed disturbance and cable installation. In the absence of rigorous modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty is relevant to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment framework.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application hampers the ability to evaluate whether appropriate safeguards exist to address pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation must be evaluated prior to granting consent, and the absence of such information renders lawful determination unfeasible. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainties surrounding potential impacts leads to a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application lacks a thorough assessment of the ecological and socio-economic impacts. It fails to provide evidence that the diverse habitats and activities in the area can be preserved without significant disruption.

One major concern is the assertion that fishing activities can be relocated without any consequences. The application does not demonstrate that there are alternative fishing grounds available, accessible, or capable of withstanding added pressure. This oversight is critical, as the potential for overfishing in other areas could have adverse economic effects on the local fishing fleet. Without a solid, evidence-based evaluation, the implications for fisheries and livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise created during construction. The use of high-energy hammer piling for extended periods will likely disturb marine life over vast areas, notably affecting species like dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays the significance of these effects, lacking sufficient evidence to support this minimisation.

There is also a glaring inconsistency in the application regarding the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction questions the reliability of the assessment and highlights concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

Moreover, the assessment does not adequately consider the cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable repercussions on marine biodiversity, making it impossible to conclude that the proposal represents sustainable development.

In summary, the shortcomings regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These inadequacies hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning the onshore infrastructure is significantly incomplete and neglects to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines are closely interconnected with the onshore works, yet they are assessed in isolation, leading to a disjointed approach that conceals the true extent of environmental and socio-economic repercussions.

The onshore aspects of the project include cabling that crosses protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. Notably, this work involves excavation across deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Excluding or postponing the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the differentiation between offshore and onshore elements leads to a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks to delicate habitats, such as machair systems

and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been undertaken, casting doubt on the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which play a crucial role in the environmental quality, cultural identity, and tourism value of the area. However, the proposal introduces permanent red aviation lighting that would be visible over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the area's identity and the emerging sector of astro-tourism, this omission is particularly concerning and highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application does not evaluate the effects of artificial lighting on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel. These species are vulnerable to disorientation caused by phototaxis, which can increase their risk of collision. The absence of any lighting impact assessment or phototaxis study means that the proposal neglects to consider how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data within the ornithological assessment exacerbates this issue, as it fails to capture nocturnal activity and associated risks. For instance,

Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the potential ecological impacts.

Without an assessment 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 is not met, engaging the precautionary principle and hindering a lawful determination.

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

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render 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 scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers or the overall economic contribution of tourism. This is particularly concerning given that tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. The sector accounts for as much as 16% of the island's economy. However, the application does not model the potential economic impacts of industrialisation on the seascape or the resulting loss of environmental quality. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the vital role of environmental quality in enhancing the tourism experience. Unspoiled landscapes and dark skies are crucial to attracting visitors, particularly in emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in the understanding of the proposal's effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the lack of analysis regarding tourism impacts bears 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 evaluated, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short in demonstrating compliance with

National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposed development.

Taken together, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects of the proposal 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.

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: 88FC5E3B

Member of the public 1546

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, which fails to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it provides only a narrative account of project evolution. This methodology does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to the shore in determining impact, the absence of such analysis prevents any conclusion that the proposed siting is the least damaging option available.

The issues are also evident in the assessment of cable routing and landfall, where there is inadequate evidence to suggest that alternative routes have been properly explored to avoid or mitigate impacts on sensitive receptors. This includes locations of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that mitigation by design has not been implemented, resulting in reliance on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This represents a significant departure from the established mitigation hierarchy, thereby preventing the competent authority from determining whether more suitable and less harmful alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community well-being. The failure to provide a structured and comparative assessment is a material omission that ultimately indicates that the application has not been adequately evaluated and does not support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, lacking a complete understanding of the ecological receptors within the West Lewis coastal environment. This region is a biologically active and sensitive marine system, yet the baseline data presented is inadequate. The methodologies employed fail to effectively capture the presence, behaviour, and habitat use of species, leading to an unreliable basis for evaluating impacts.

A significant oversight is the assessment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been thoroughly evaluated. Consequently, this undermines the conclusions regarding the lack of significant effects on this species.

Additional shortcomings are evident in the evaluation of basking sharks, where reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in light of established land-based observations that indicate frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers the assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty around the actual risks 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 means that adverse effects cannot be excluded beyond reasonable scientific doubt, engaging the precautionary principle. In light of this, consent cannot be lawfully granted.

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues hinder a robust evaluation of the 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 regarding ornithological impacts associated with the proposed development is significantly flawed, demonstrating serious gaps in evidence and inconsistencies that compromise its conclusions. Notably, the development is situated in areas critical for foraging and along migratory paths used by seabirds, yet the application fails to adequately assess the potential effects of displacement, collision risk, and habitat loss on these species. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. The evidence provided does not meet the necessary standards to confirm that these species will not be negatively impacted.

Moreover, the assessment presents a fundamental contradiction; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is only applicable if significant harm is

anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that its conclusions lack a solid evidentiary foundation. The implications of the feeding grounds for seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, are inadequately addressed. The reliance on modelling introduces additional uncertainty, particularly concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies utilised appear to underestimate mortality risks, especially given that baseline data is incomplete and the behavioural responses of the species are not thoroughly understood.

Furthermore, the location of turbines within a recognised migratory corridor adds an additional layer of risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor are not sufficiently evaluated, nor are the potential impacts on species with relatively small global populations considered. From a regulatory standpoint, the application does not satisfy the evidential threshold required to assert that there will be no adverse effect on the integrity of the protected sites. The presence of conflicting conclusions, alongside notable data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which hinders a lawful conclusion that could support the granting of consent.

Ultimately, the deficiencies noted within the assessment point to a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to convincingly demonstrate that internationally significant seabird populations will remain unaffected places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable, marked by internal contradictions, methodological weaknesses, and inadequate evidence. Such shortcomings obstruct a comprehensive evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements essential for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally lacking and does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. This application employs a simplistic approach, viewing heritage merely as a collection of discrete, unchanging assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

One significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment regards them as static features, overlooking their continued significance and the potential impact of development on their context. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance in community life.

Additionally, the application does not consider intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity but are completely omitted from the assessment, marking a considerable gap. Without addressing these factors, the cultural implications of the development cannot be accurately evaluated.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinctive cultural identity that aligns with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement diminishes the validity of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental concerns.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and sites. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, represents a clear violation of policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal's lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are potentially at stake. Without the full dataset, the application does not provide a comprehensive evidential basis for weighing the benefits against the harms.

Moreover, the assessment of social impacts, health, and wellbeing is critically deficient and lacks the necessary transparency for a lawful evaluation. Although the developer engaged local residents through a Social Impact Assessment, the complete report has not been made available. This creates a substantial evidential gap, obstructing both public insight and the competent authority's ability to comprehend the full scope of social risks identified by the developer's own research.

Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, and therefore are not speculative in nature. However, the failure to disclose the entire assessment hampers proper scrutiny of these findings and restricts the capacity to ascertain their significance in the decision-making process.

There is also a clear indication that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the main application or afforded the appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 in terms of health and wellbeing. Development should promote positive health outcomes and avoid causing harm, yet the existing evidence points to adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission is a material flaw within the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts leads to an incomplete and unreliable assessment. This reality obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding the seascape, landscape, and visual impacts is fundamentally inadequate, failing to accurately capture the extent of change and 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 proposal to introduce large-scale turbines near the shore would lead to a continuous and overwhelming industrial presence, significantly altering this distinctive character and resulting in an irreversible transformation of the landscape.

Additionally, the application does not sufficiently reflect the extent of the visual change that would occur. The size and closeness of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would directly impact visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to adequately express the level of this impact or its significance within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This leads to the possibility that the magnitude of visual impact has been understated, thereby questioning the reliability of the assessment.

Moreover, there is a notable deficiency in assessing the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets in isolation instead of recognising their interdependence, resulting in a failure to thoroughly evaluate 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 appreciated and disrupting their ties to the natural horizon. This represents a visual impact along with broader cultural and spatial harm that the application has not adequately evaluated.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historical assets. The scale of proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a solid worst-case assessment undermines any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposed project involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead depending on mitigation and contingency measures to be created after consent. This approach prevents any meaningful assessment of whether these measures will be adequate or

effective.

The West Lewis coastline, which is home to clean coastal waters and vulnerable habitats, is particularly sensitive to sediment disturbance and contamination. Although the application acknowledges the risks of sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to potential effects on sensitive marine species and habitats noted in the broader assessment.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning until after consent means that there is no evaluation of whether suitable safeguards are in place to deal with pollution events. This introduces procedural risks and hinders the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, this deferral of essential environmental safeguards is at odds with 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 fails to show 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 leads to a materially deficient assessment. These shortcomings obstruct a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries within the application is notably inadequate, failing to present a thorough analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are known to host a vibrant marine ecosystem alongside a thriving fishing industry. However, the application does not adequately demonstrate how these critical habitats and activities will be preserved or sustained in the face of proposed developments without incurring significant disruption.

A critical concern arises from the presumption that fishing activities can be relocated without adverse effects. The absence of evidence to support the availability, accessibility, and capacity of alternative fishing grounds is a considerable oversight. This lack of information is particularly troubling, as it poses risks of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries

and the livelihoods dependent on them remain unclear.

Moreover, the proposal raises significant risks to marine species, especially due to the underwater noise produced during the construction phase. The anticipated high-energy hammer piling over an extended period is likely to disrupt marine life across considerable distances, with particular concern for species such as dolphins. The expected disturbance to a notable segment of the local bottlenose dolphin population is alarming, yet the application diminishes the importance of these effects without adequate supporting evidence.

The application also presents inconsistencies by acknowledging the necessity for licences to allow harm to European Protected Species while simultaneously deeming the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when anticipated harm necessitates legal permission.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A failure to comprehensively evaluate these cumulative effects leaves the overall impact on marine ecosystems and socio-economic conditions indeterminate.

From a policy perspective, the application does not convincingly demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It falls short of proving that the development can coexist with established marine users or that it can mitigate unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies of the application result in an incomplete and unreliable assessment. These shortcomings obstruct any robust evaluation of the potential effects on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks any assessment of dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the environmental quality, cultural identity, and tourism appeal of the area. The introduction of permanent red aviation lighting, which will be visible over long distances, will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is especially important considering the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to address these impacts

represents a clear gap in the overall assessment of the landscape and environment.

Moreover, there is no analysis of how nocturnal wildlife will be affected. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not contain any lighting impact assessment or phototaxis study, failing to evaluate the effects of aviation lighting on these species or their mortality rates.

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

Without assessing the nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be negatively impacted. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The application significantly overlooks the assessment of tourism impacts, which is crucial for the Isle of Lewis. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and a sense of remoteness. It is noted that 86% of visitors are attracted by the scenery, yet there is no quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle has expanded notably, rising from £65 million in 2017 to more than £81.5 million, and supports over 1,000 jobs, making up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it remains unclear whether the development would provide a net economic benefit or harm an established and growing sector.

Furthermore, the role of environmental quality in fostering tourism has not been considered. Unspoiled landscapes and dark skies are essential for visitor experiences, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the impacts on an important and expanding part of the local economy.

In an island community with limited economic diversity, neglecting the assessment of tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately 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 conflicts with strategic objectives that identify tourism as a key growth sector and fails to provide the necessary evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the lack of quantification of tourism impacts, the neglect of environmental influences on visitor behaviour, and the failure to consider the island's economic dependency contribute to 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 represents a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis provided for this application, including incomplete baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways such as effects on nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a comprehensive understanding of the likely significant effects or residual impacts.

Moreover, the application exhibits clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes 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.

In addition, the proposal is at odds with National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been properly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to affirm the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing any lawful conclusion that impacts can be deemed 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 negative effects on tourism signify permanent impacts that cannot be adequately mitigated.

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

Consequently, 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 proposed windfarm will not directly affect me as I live in south Kintyre, however I join with the local community in expressing my doubts, fears and sheer horror at the thought of this being allowed.
Much data has been already included in the main part of this letter. There is undeniable proof of the harm this project will bring to the islanders, the birds and sea creatures and Scotland itself, as a worldwide tourist attraction.
But what makes me sad is how humans have forgotten nature and become greedy , selfish consumers, ready to sacrifice other creatures under the guise of ‘save the planet’. We do not have the right to sacrifice others in order to save ourselves.
Everything on earth is here for a reason and the balance is perfect. Human beings aren’t even necessary.
That is a sobering thought.
Yet here we are, stamping on local people, putting their physical and mental health in danger for what? Being able to say ‘this huge windfarm will power so many thousand homes’? It has all become ludicrous , like so many things in the world today.
We need to protect dark skies, protect our marine creatures, protect our birds, protect

our precious clean water……these are our riches.
I support a pause on all new windfarms, on and off shore, until the government can show that they actually have an energy plan.

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: 23477AF2

Member of the public 1547

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 regimes. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental consideration, cultural impact, and procedural adherence. The proposed development is situated off the west coast of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not furnish an adequate evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal remain unspecified. The application's flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their efficacy unassessable. Consequently, the documents fail to provide a comprehensive or informed insight into the environmental, cultural, or community implications, and claims of negligible or non-significant effects lack robust evidential support.

There are evident and substantial conflicts with policy. The proposal appears to diverge from the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability from a policy perspective.

The magnitude of the proposal is unprecedented for this area, with large turbines situated in close proximity to the shore, raising significant issues related to landscape capacity, visual dominance, and environmental ramifications. The cumulative effect of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrates that the application is incomplete and fails to support a lawful determination. In light of these concerns, the precautionary principle must be invoked.

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 thorough assessment of alternatives, which is a requirement of the Environmental Impact Assessment regime. Instead of offering a detailed comparison of viable alternatives based on their environmental effects, it merely outlines the evolution of the project. This narrative does not show that the developer has properly identified, evaluated, and chosen less harmful options over

more damaging ones.

There is a lack of clear and evidence-based comparisons regarding offshore locations, development scales, and design configurations. Notably, the application does not indicate that the possibility of placing turbines further offshore has been adequately considered, despite this option likely reducing visual, ecological, and coastal impacts. The West Lewis coastline is sensitive, and proximity to the shore is critical in assessing impact. Therefore, the absence of such analysis makes it impossible to conclude that the proposed siting is the least damaging choice.

This inadequacy also extends to the routing of cables and landfall assessments, where there is insufficient evidence that alternative routes have been thoroughly explored to minimise impacts on sensitive areas. This includes locations of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that mitigation by design has not been implemented, relying instead on measures to mitigate after design.

Consequently, the application does not show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This neglects the established mitigation hierarchy, preventing the competent authority from ascertaining whether less harmful and more suitable alternatives are available. Without a solid assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially regarding the protection of natural areas, 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 has not been sufficiently assessed to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. There is a critical failure to demonstrate that these species will not be adversely affected by the proposed development, which is situated within key foraging areas and migratory pathways. The assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss for these seabirds.

A fundamental contradiction arises in the application, where the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, a process that is only necessary when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn are not supported by robust evidence. Furthermore, the assessment fails to provide sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not thoroughly acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly regarding species in critical decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and inadequate understanding of behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor poses an additional and significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term implications of continued

mortality within this corridor and fails to consider the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This necessitates the application of the precautionary principle, which hampers a lawful conclusion in support of consent. Additionally, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy in assessing cultural heritage and community identity is deeply concerning, especially regarding the West Lewis coastline, which should be recognised as a living cultural landscape. This area embodies a profound interconnection between environment, language, tradition, and community. Instead, the application takes a simplistic approach, treating heritage as isolated, static entities rather than acknowledging their active social, cultural, and spiritual roles within the community.

There is a significant shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These locations serve as vital sites for burial and spiritual practices, yet they are misrepresented as mere static features in the assessment. This failure to recognise their ongoing significance and continued use leads to an incomplete evaluation of cultural effects, neglecting their importance to community life.

Furthermore, the assessment disregards intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are completely overlooked, creating a substantial gap in understanding the cultural impact of the proposed development.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity, akin to that of Indigenous Peoples, yet there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and neglects established principles of participation in decisions that affect cultural and environmental interests.

There is also a critical procedural failure evident in the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, making any determination unlawful.

From a policy standpoint, these failures put the proposal in direct contradiction with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the lack of recognition for living cultural practices, represents a clear deviation from policy requirements.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminate in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, leaving the application without a sufficient foundation for evaluating the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current assessment of health, wellbeing, and social impacts is significantly lacking in transparency, which raises serious concerns about its legality. While the developer has initiated a Social Impact Assessment that included focus groups with local residents, the absence of the full report creates a considerable evidential void. This lack of comprehensive information restricts both public understanding and the competent authority's ability to grasp the full extent of social risks identified by the developer's research.

Residents have reported experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are founded on direct community engagement, thus are not merely speculative. However, the withholding of the complete assessment inhibits proper scrutiny of these findings and diminishes their relevance in the decision-making process.

Moreover, there is a prevailing sentiment that this proposal poses a threat to community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Unfortunately, such critical impacts have not been adequately reflected in the main application nor given the necessary consideration. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health consequences is vital for developments of this magnitude, especially when they can affect community character and functioning. Without the complete dataset, the application does not provide a robust evidential basis for weighing the potential benefits against the possible

harms.

From a policy standpoint, the application does not appear to align with the requirements of National Planning Framework 4 concerning health and wellbeing. Developments should enhance positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that have not been transparently communicated. Without access to the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications of this situation 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 significant omission within the application fails to meet the evidential standards required by the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the evaluation incomplete and unreliable. This situation hampers a lawful determination and underscores that the application lacks sufficient information to be considered valid.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking and does not adequately account for the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately depict the magnitude of visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the defining qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise in the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints may not adequately 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 magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a wider landscape setting connected visually and spatially to the Atlantic horizon. The

assessment treats these assets in isolation rather than acknowledging their interdependence, resulting in an incomplete analysis of the impacts on their setting and cultural significance.

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

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The magnitude of change contradicts the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertions of policy compliance.

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 dominant and unavoidable. As a result, the change is fundamental and permanent, rather than reducible to an acceptable level through mitigation.

In summary, the assessment does not accurately represent 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 incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises significant concerns regarding the incomplete assessment of construction and pollution risks, which fails to provide adequate detail for evaluating potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application places reliance on mitigation and contingency measures that are to be prepared post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially troubling considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Further compounding these issues is the uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty

extends 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 concerns. By postponing contingency planning until after consent, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application concerning the development off the West Lewis coast reveals significant deficiencies in its assessment of fisheries and marine life, which undermines its reliability. The ecological evaluation does not adequately address the diverse marine ecosystem present in these waters, nor does it consider the active fishing industry. The failure to demonstrate how these vital uses and habitats can be protected or maintained without substantial disruption is concerning.

A notable flaw in the proposal is the assumption that fishing activities can be displaced without adverse effects. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This absence of information is critical, as the potential for overfishing in different areas could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged period is expected to disturb a wide area, affecting species like dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without adequate supporting evidence.

The assessment contains an evident contradiction; while it acknowledges the necessity

for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various pressures such as habitat disturbance, noise, and displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings prevent an accurate evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

Concerns also arise regarding carbon balance. The disturbance of peatland releases stored carbon, which could create a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently tackle this issue or show that the overall carbon balance remains beneficial.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a substantial oversight. The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a disruptive "wall of light" that would significantly alter the night-time atmosphere.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly important considering the role of dark skies in the identity of the region and the growth of tourism sectors such as astro-tourism. As a result, this failure leads to a considerable gap in the comprehensive landscape and environmental assessment.

Additionally, there is no consideration of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and an increased risk of collision. The proposal lacks a lighting impact assessment or a study on phototaxis, meaning it fails to evaluate how aviation lighting may affect these vulnerable species or contribute to increased mortality rates.

This deficiency is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or

the associated risks. Kittiwakes, for instance, may forage or migrate during the night, and the disorientation caused by artificial lighting poses a risk that has not been addressed. The lack of specific night-time data is a critical gap in understanding the ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, which engages the precautionary principle and hampers a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the preservation of natural areas and environmental quality. It also undermines a broader assessment of landscape and seascape impacts, as the character of the night forms a crucial element of the environment.

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

TOURISM

The economy of the Isle of Lewis significantly relies on tourism, which has grown 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 importance, the application does not model the potential impacts of offshore infrastructure on the tourism sector, particularly concerning visitor numbers, behaviour, or overall economic contributions. The assessment overlooks the industrialisation of the seascape and the potential loss of environmental quality, failing to evaluate how these factors could affect Tourism Gross Value Added and the overall resilience of the local economy.

Tourism is fundamentally reliant on the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery but lacks a quantified analysis of how large-scale developments might influence this attraction. The omission of a Dark Skies Assessment further exacerbates the deficiencies in the evaluation, leaving significant uncertainties about impacts on emerging markets like nature-based tourism and astro-tourism.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and community sustainability in a context where economic diversification is already limited. The absence of a compliant Island Communities Impact Assessment means that critical economic vulnerabilities related to tourism have not been properly examined, contrary to the requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not meet the standards of the National

Planning Framework 4 regarding economic impact and the necessity of demonstrating a net benefit. It conflicts with strategic objectives that position tourism as a key growth sector and lacks the evidence needed for competent authorities to fully understand the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependency creates a substantial evidential gap. This deficiency hinders a thorough evaluation of the economic effects and underscores the incompleteness of the application.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the principal issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of proposed industrialisation was deemed unacceptable. Despite being presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

There are critical gaps within the evidential basis provided for this proposal, including an incomplete assessment of baseline data and the use of an unspecified design envelope. Additionally, there is a reliance on unverified mitigation measures and the absence of essential impact assessments regarding nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations as per the Islands (Scotland) Act 2018. Furthermore, the omission of a comprehensive Social Impact Assessment constitutes a substantial material gap. These inadequacies inhibit the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not establish that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, as there is no modelling of tourism impacts. The cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete and internally inconsistent assessments regarding marine ecology, seabirds, protected species, and marine mammals fail to meet the evidential

threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and precludes a lawful conclusion that the impacts of the proposal are acceptable.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The magnitude of information deficiencies, alongside policy inconsistencies and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

This proposed offshore wind farm is not only a horrendous blight on our beautiful landscape it will cause enormous and irreversible damage to both land and marine wildlife. The project cannot be justified with such a short lifespan of these enormous wind turbines and the catastrophic environmental damage caused by them. There is no way of recycling the parts and they have to be buried underground which is another environmental disaster. Our island relies heavily on tourism and this project will have a detrimental effect with fewer visitors as a result. An income that families rely on. The fact that a multinational company with absolutely no links to this island has been given the rights to this with no benefit whatsoever to the island is appalling. The untold damage caused to our shoreline and moors with roads and heavy traffic is a major issue. This project must be stopped! We will look back on this as one of the disasters of our time in Scotland.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8764469E

Member of the public 1548

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 its accompanying documents, highlighting material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns surrounding the scale, proximity, and design of the proposal raise fundamental questions regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation necessary for a lawful determination. There are notable gaps in critical environmental data, and the baseline information presented is both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework complicates the understanding of likely significant effects. The reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident throughout the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises significant issues, with large turbines planned in close proximity to the shoreline, which introduces serious concerns about landscape capacity, visual dominance, and overall environmental impact. In summary, the combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and lacks a complete, transparent, and reliable evaluation of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the integrity of the assessment, making it impossible for both the public and the competent authority to grasp the true extent of environmental impacts that may arise from the development as ultimately constructed.

Additionally, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental damage will be managed later hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Furthermore, there are notable evidential inadequacies, including lapses in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues lead to 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 hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential requirements set forth under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, as it cannot verify that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, rendering the competent authority incapable of making a well-informed determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to demonstrate a proper assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application presents a narrative that outlines the project's

evolution. This methodology does not establish that less harmful options have been adequately identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not prove that the developer has seriously explored the option of positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact further highlight the need for such analysis. The failure to include this evaluation undermines any conclusion regarding whether the proposed siting constitutes the least damaging choice.

The shortcomings also extend to the evaluation of cable routing and landfall options, with insufficient evidence provided to show that alternative routes have been thoroughly examined to avert or lessen impacts on sensitive receptors. This encompasses locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis signifies that mitigation by design has not been employed, with the focus instead being on post-design mitigation measures.

Consequently, the application does not prove that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This omission constitutes a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives available. The lack of a comprehensive assessment of alternatives raises concerns regarding the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally inadequate, lacking a comprehensive and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture crucial information regarding species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Significant omissions are evident, particularly concerning otters, which are classified as a European Protected Species. The application does not adequately recognise or

assess their utilisation of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential implications of construction disturbance, noise, and increased human activity remain inadequately evaluated. This oversight undermines any claims regarding the absence of significant effects on this species.

Further issues are present in the assessment of basking sharks, where an overreliance on aerial surveys leads to considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to appropriately incorporate or consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment pertaining to the proposed development is fundamentally unreliable, featuring significant internal inconsistencies and gaps in evidence that severely undermine its conclusions. This development is situated in critical foraging areas and migratory pathways along the west coast of the Isle of Lewis, which 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 remain unaffected, failing to meet the evidential standard required for such assertions.

Moreover, there exists a stark contradiction within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency calls into question the trustworthiness of the

assessment, highlighting that the conclusions drawn are not substantiated by the available evidence. The assessment fails to provide robust proof that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will not suffer negative impacts. The critical nature of these feeding grounds has not been thoroughly addressed, and the reliance on modelling approaches creates uncertainty, particularly for species that are facing severe declines, such as Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate potential mortality, especially in contexts where baseline data is lacking and the behavioural responses of species are inadequately understood.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively establishing a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality in this corridor or the potential effects on species with limited global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This activates the precautionary principle and obstructs a lawful conclusion supporting consent.

Additionally, the deficiencies observed illustrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to conclusively demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological shortcomings, and insufficient evidence. These failings hinder a thorough evaluation of impacts and collectively contribute to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment concerning cultural heritage and community identity is evident, particularly as it overlooks the West Lewis coastline's status as a living cultural landscape. This area, where environment, language, tradition, and community are deeply intertwined, is treated reductively in the application, which views heritage merely as a collection of isolated, static assets. This perspective fails to recognise the ongoing social, cultural, and spiritual significance these elements hold within the community.

A notable shortcoming is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice, yet the assessment categorises them as static features

without acknowledging their continued use or the implications of development on their surroundings. Such mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance in community life.

Moreover, the application does not address intangible cultural heritage elements, including the Gaelic language and traditions, nor the enduring relationship between the community and the coastal environment. These aspects are integral to the area's identity but are entirely overlooked in the assessment, indicating a considerable omission. Without considering these vital factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement, particularly for the Gaelic-speaking population, which has a distinct cultural identity recognised as characteristic of an Indigenous People. The lack of a process for Free, Prior and Informed Consent is particularly troubling, as it undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a significant procedural failure is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, which alone undermines the lawfulness of the determination.

From a policy standpoint, the deficiencies identified place the proposal in direct conflict with the 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 acknowledge living cultural practices, is a clear deviation from established policy requirements.

In conclusion, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application lacks a sound basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks the necessary transparency and detail in its assessment of social impacts, health, and wellbeing, rendering it materially deficient and unlawful. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the full report remains unpublished. This results in a significant evidential gap, hindering both public understanding and the ability of the competent authority to grasp the full extent of social risks identified through the developer's own research.

Summaries available indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts

arise from direct engagement, thereby eliminating speculation. Nevertheless, the failure to disclose the complete assessment limits proper scrutiny of the findings and obstructs a meaningful evaluation of their significance in the decision-making process.

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

This lack of transparency further undermines the Environmental Impact Assessment process, which requires a comprehensive understanding of social, economic, and health impacts, especially for developments of this magnitude that may affect community character and functioning. By withholding the complete dataset, the application fails to provide a robust evidential basis needed to assess the balance between benefits and harm.

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 to mitigate harm; however, the evidence suggests existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a material failure within the application, breaching 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 negative impacts, results in an incomplete and unreliable assessment. This situation impedes a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposal's impact on seascape, landscape, and visual aspects is insufficient and fails to adequately capture the extent of the changes and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped nature that conveys a strong sense of remoteness. The addition of large-scale turbines near the shoreline would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent transformation of the landscape.

The proposed turbines would dominate the views from residential areas, historic sites, and popular coastal locations, which would significantly affect visual amenity and

detract from the naturalness and remoteness of the environment. The assessment does not effectively communicate the magnitude of this impact or its importance in the context of such a sensitive landscape.

Methodological issues are evident in the selection and presentation of visual viewpoints, as the evidence indicates that these viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises concerns that the assessment has understated the visual impact, calling into question its reliability.

Additionally, the relationship between landscape, seascape, and cultural heritage has not been adequately considered. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are interconnected within the broader landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, which results in an incomplete understanding of the impact on their context and cultural significance.

The proposed industrialisation of the seascape would disrupt these interrelationships, altering how heritage assets are perceived and their connection to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial detriment that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural areas and historic assets. The scale of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further questions any claims of compliance with policy.

Moreover, the identified impacts are unlikely to be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be prominent and unavoidable. Consequently, the change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to incomplete assessments of construction and pollution risks. The lack of fully developed Construction Environmental Management Plans and Pollution Prevention Plans means there is insufficient detail to assess likely environmental effects. Substantial seabed preparation and installation work will occur in a high-energy Atlantic environment, yet mitigation and contingency

measures are only intended to be created after consent is granted. This approach prevents any real evaluation of their adequacy or effectiveness.

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

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

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

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

FISHERIES AND MARINE LIFE

The application presents significant shortcomings in its assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the proposal does not adequately demonstrate that these vital uses and habitats can be safeguarded or sustained without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be displaced without any repercussions. There is no evidence provided to indicate that alternative fishing grounds are available, accessible, or capable of bearing increased pressure. This lack of information is concerning, as displacement could lead to overfishing in other areas and may have broader economic implications for the local

fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise resulting from construction activities. The high-energy hammer piling expected to occur over an extended period is likely to cause disturbances across considerable distances, which could adversely affect species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population is alarming, yet the application minimizes the importance of these effects without adequate supporting evidence.

In addition, there is a notable inconsistency within the application regarding the requirement for licences to permit harm to European Protected Species, which is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction undermines the reliability of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal approval.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes significant onshore infrastructure, yet the assessment of these elements is materially incomplete, failing to consider the full extent of impacts arising from this single integrated project. The onshore works, which encompass cabling across protected moorland and the construction of a substation near Stornoway, are linked intrinsically to the offshore turbines. However, these components have been assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Excavation across areas of deep peat, particularly within Barvas Moor, poses a threat to a significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, which prevents a full

understanding of the project's overall environmental footprint. By excluding or deferring the evaluation of onshore impacts, the application inhibits proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; yet, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Concerns also arise regarding significant risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This omission creates a clear evidential gap concerning biodiversity protection. Furthermore, the disturbance of peatland could lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this issue and fails 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 in the application that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation. From a policy perspective, 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 demonstrate that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the crucial aspects of dark skies and nocturnal wildlife, marking a significant omission. The West Lewis coastline boasts exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly for developing sectors like astro-tourism. However, the proposal includes permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

Furthermore, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This oversight is especially troubling given the importance of dark skies to the area's identity. The lack of consideration for these impacts results in a clear deficiency in the overall environmental and landscape assessment.

Equally concerning is the complete absence of an evaluation of the effects on nocturnal wildlife. Sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk from artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting might affect these species or contribute to mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or its associated risks. Kittiwakes, for instance, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

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

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

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. Without baseline data, impact modelling, and species-specific analysis, the application remains incomplete and fails to support a lawful determination.

TOURISM

The assessment regarding the impacts on tourism is significantly lacking, failing to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. With tourism relying heavily on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness, it is concerning that the application acknowledges that 86% of visitors are attracted by the scenery yet does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or their overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and contributing up to 16% to the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains unclear whether the development would result in a net economic benefit or adversely affect an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, including emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leading to a considerable gap in understanding the impacts on this recognised and growing aspect of the local economy.

In an island community with limited economic diversification, the oversight in assessing tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

When taken together, the deficiencies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency create a substantial 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 fails to meet the statutory requirements for sustainable development as outlined in national policy and evidential standards. This proposal is reminiscent of the 2008 Lewis Wind Power application, which was rejected due to unacceptable levels of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not address the critical issues raised in the previous refusal.

Significant gaps exist in the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects render the Environmental Impact Assessment incomplete. As a result, the assessment fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment constitutes a

material omission. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to confirm that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The failure to properly assess the cumulative impacts of offshore and onshore components obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain unclear and potentially significant. The assessments provided do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, which engages the precautionary principle and prevents a lawful determination that impacts are acceptable.

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

In light of these substantive and procedural deficiencies, the application is unfit for determination. The combination of information gaps, policy conflicts, and unresolved environmental risks precludes a lawful, evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

I am objecting to the proposed wind farm for all the above reasons. The noise and disruption to the community of the construction. There are people who have had wind turbines built further away from their houses who have had to move because of the noise and vibration pollution in spite of no longer being able to sell their homes (Preliminary Results:Exploring why some Families Living in Proximity to Wind Turbine Facilities Contemplate Vacating their Homes:Open Access Library Journal 31 February 2020, Carman et al)

The Health effects of living near turbines may be subjective but it is important that if there have to be turbines they should be correctly sited to increase social acceptance. (Health effects related to Wind Turbine Sound-A rapid evidence review covering 2020-2024:UK/HSA.gov.uk 2025:Woodland et al)

The detrimental affect on our unique scenery, wildlife, marine life and birds though unknown can be surmised by the impact of the huge windfarms on the East coast of East Anglia. These farms are further out to sea than the one proposed for the Hebrides and are still noisy when in operation and have had a huge affect on marine and bird life. It is also not what tourists expect to see on a rural crofting and fishing landscape.(Offshore windfarms could cause significant ecosystem, economic and human health risks:pml.ac.uk: February 2025)

The whole project appears not to benefit the indigenous population who will not gain any security of or reduced price electricity but suffer the inconvenience of increased traffic from workers and equipment and an influx of a non indigenous workforce who may push up the price of accommodation: already in short supply for local people and affect the cultural singularities of the Island, also straining our limited resources. This may also have an impact on the already beleaguered ferry and flight services.

Please consider an alternative.

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: 9BFC13BF

Member of the public 1549

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies concerning planning, environmental factors, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region known for its stunning Atlantic-facing coastline, near-pristine surroundings, and rich cultural identity. Concerns arise from the scale, proximity, and design of the project, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful decision. There is a troubling absence of critical environmental data, with baseline information being limited and inconsistent, while important elements of the proposal remain undefined. The flexible design framework used complicates a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not facilitate a comprehensive or informed grasp of the environmental, cultural, or community impacts. Claims regarding negligible or non-significant effects lack robust evidence to support them.

There are notable and substantive policy conflicts present. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It fails to demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to determine the development's acceptability within policy parameters.

The unprecedented scale of the proposal raises significant concerns about its impact on the local landscape, with large turbines positioned alarmingly close to the shoreline, which threatens to dominate the visual environment and adversely affect the ecology. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial details and does not adequately outline the potential environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity, making it impossible to apply a worst-case scenario consistently. Consequently, the impacts described may not accurately represent the final development, leaving both the public and the competent authority unaware of the actual environmental effects.

Moreover, the application places significant reliance on unformed mitigation measures, monitoring strategies, and management plans. Seeking consent based on promises of addressing environmental harm at a later stage hinders any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information until after consent is granted contradicts the fundamental principles of the Environmental Impact Assessment regime, which requires that significant effects and mitigation are clearly defined before any determination.

There are also major gaps in evidence, such as insufficient baseline data, methodological limitations, and reliance on assumptions instead of site-specific facts. These issues lead to uncertainty about the impact scale and significance, particularly where claims of negligible or non-significant effects lack strong supporting data. The insufficient information restricts a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that do not align with statutory requirements.

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

In summary, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both 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 information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is seriously lacking. This region is known for its sensitivity and biological activity, yet the baseline data presented is inadequate. The methodologies employed do not sufficiently capture the presence, behaviour, or habitat usage of key species, leading to a lack of reliable evidence for evaluating potential impacts.

In particular, there is a significant oversight regarding otters, classified as a European Protected Species. The application fails to properly acknowledge their active utilisation of coastal areas for foraging and movement. As a result, the assessment does not adequately consider their core foraging range and behaviour, leaving the potential impacts of construction disturbances, noise, and increased activity inadequately evaluated. Consequently, any claims regarding the absence of significant effects on otters are fundamentally undermined.

Furthermore, the assessment of basking sharks is flawed due to an overreliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic weather conditions. This methodology likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The disregard for such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on mere assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful analysis of cumulative and indirect impacts, including seasonal changes and interactions within the broader ecosystem. This introduces uncertainty about the actual risks 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. The proper identification and assessment of protected species are notably absent. The resulting uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a designated migratory corridor on the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately demonstrate, to the required evidential standard, that these species will not be adversely affected. It fails to robustly evaluate critical factors such as displacement, collision risk, or habitat loss associated with the proposed development, particularly given its location within key foraging areas and migratory

pathways.

A fundamental contradiction is evident in the application. While the developer claims there will be no significant adverse effects, it simultaneously puts forth a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that its conclusions lack proper support from the underlying evidence. The assessment inadequately addresses the potential effects on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling approaches introduces a layer of uncertainty, particularly for species that are already experiencing severe declines, like Kittiwakes and Fulmars. Consequently, the methodologies used may underestimate mortality rates, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor introduces significant risks, effectively obstructing a primary flight path that species utilise when travelling between the United Kingdom and Iceland. The assessment does not sufficiently analyse the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. Regulatory concerns arise from the application's failure to meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the assessment has not satisfied the standard of beyond reasonable scientific doubt. This scenario invokes the precautionary principle, which hampers the ability to reach a lawful conclusion in favour of granting consent.

The identified deficiencies also suggest a failure to comply with 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. Collectively, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such flaws hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a positive determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity related to the proposed development is fundamentally inadequate. It fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically connected. This application adopts a reductive approach, treating heritage as isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual functions within the community.

Significant deficiencies exist in the treatment of culturally important sites, particularly

the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static features. This oversight neglects their continued use, meaning, and the impact of development on their setting, resulting in an incomplete evaluation of cultural effects and disregarding their role in community life.

Moreover, the application does not adequately assess intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, which represents a significant omission. The lack of consideration of these factors hinders a proper understanding of the cultural impact of the development.

There are also concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as an Indigenous People, yet no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

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, along with the lack of recognition of living cultural practices, represents a clear departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 proposal to introduce large-scale turbines close to the West Lewis coastline poses a significant threat to the area’s natural landscape and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The addition of such industrial structures would create a persistent and overwhelming presence that would irrevocably change this character, leading to a permanent alteration of the landscape.

The assessment presented within the application does not adequately reflect the magnitude of the visual changes that would occur. Given their scale and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The report fails to convey the true extent of this impact or its significance, particularly within the context of such a sensitive

environment.

There are serious methodological issues regarding the selection and representation of visual viewpoints in the assessment. It appears that the chosen viewpoints may not fully represent the most sensitive receptors or potential worst-case scenarios, especially concerning vital cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been downplayed, which undermines the credibility of the assessment.

Moreover, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these assets as isolated, resulting in an incomplete consideration of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally altering how heritage assets are perceived and diminishing their connection to the natural horizon. This situation presents not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The anticipated scale of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment undermines any assertion of compliance with policy guidelines.

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. Thus, the resulting changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of the 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 safeguarding of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant construction activities and seabed preparation within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects adequately. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided with the

application. Instead, it relies on mitigation and contingency measures that are to be formulated after consent, which limits the ability to assess their adequacy or effectiveness meaningfully.

This dependence on undefined future measures raises considerable concern due to the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and critical habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to present sufficient detail on how these issues will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive within the wider assessment.

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

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

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application lacks sufficient depth, failing to provide a robust evaluation of both ecological and socio-economic impacts. The area off the West Lewis coast is home to a diverse marine ecosystem and supports an active fishing industry. However, the proposal does not adequately demonstrate the protection and maintenance of these vital uses and habitats without significant disruption.

A critical concern is the assumption made within the application regarding the

displacement of fishing activity, which is presented as a feasible option without acknowledging potential consequences. There is no evidence provided to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate any increased pressure. This significant omission raises concerns about overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal introduces considerable risks to marine species, especially from the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over large distances, potentially affecting species such as dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population is particularly alarming; yet, the application minimises the significance of these effects without adequate supporting evidence.

There is an evident inconsistency in the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged while simultaneously describing the impacts as negligible. This contradiction raises concerns about the credibility of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to an extent that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a fragmented assessment of onshore infrastructure, which is materially incomplete and fails to adequately account for the interrelated impacts of the offshore turbines and onshore works. This separation obscures the true environmental and socio-economic consequences of what is fundamentally a single integrated project. The onshore components involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of

access infrastructure through sensitive landscapes. Importantly, these activities entail excavation in areas of deep peat, particularly within Barvas Moor, an essential carbon store and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, which inhibits a full understanding of the project's overall environmental footprint.

Furthermore, the approach taken prevents a proper assessment of cumulative effects, as the Environmental Impact Assessment process mandates that all aspects of a project must be evaluated collectively. The existing separation of offshore and onshore components fails to capture the combined impacts on peatlands, habitats, and local communities, leaving significant gaps in understanding.

There are critical risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these ecosystems have been comprehensively evaluated or that adequate avoidance measures have been considered, revealing a significant evidential shortfall concerning biodiversity protection.

The proposal also introduces concerns related to carbon balance; the disruption of peatland has the potential to release stored carbon, thereby creating a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently tackle this issue or confirm that the overall carbon balance remains advantageous.

In addition, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, which prompts serious questions regarding the deliverability and lawful execution of the project.

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

In summary, the separation of project components, the absence of a comprehensive evaluation, and the lack of substantiating evidence regarding environmental and land use impacts culminate in an application that is incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that is visible over long distances, which would create a continuous “wall of light” effect across the western horizon. This lighting would fundamentally alter the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are a critical aspect of the area’s environmental quality, cultural identity, and

tourism value, making the lack of assessment regarding their impact a significant oversight in the Environmental Impact Assessment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the growing interest in sectors such as astro-tourism, which rely heavily on the preservation of dark skies. The absence of such an assessment creates a notable gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risks of collision. The application does not incorporate any lighting impact assessment or phototaxis study, and consequently, it fails to address how aviation lighting might affect these vulnerable species or escalate mortality rates.

This deficiency is further exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activities or the associated risks. For example, Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting; however, this potential impact has not been evaluated. The lack of site-specific night-time data results in a critical shortcoming in understanding the ecological consequences.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to confidently rule out negative consequences cannot be achieved, thus invoking the precautionary principle and hindering a lawful determination of the application.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which advocates for the protection of natural environments and the quality of the landscape. Furthermore, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecology.

In conclusion, the absence of any assessment regarding dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating 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 proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as outlined by statutory obligations, national policy, and evidential requirements. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application, despite being presented under a more robust policy framework, does not adequately address biodiversity, peatland preservation, landscape integrity, or community wellbeing.

There are notable deficiencies in the evidential basis provided for this application. Critical baseline data is lacking, and the proposal relies on an undefined design envelope along with unspecified mitigation measures. Furthermore, it omits essential impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or potential residual impacts.

Procedural shortcomings also characterise this application. The absence of a

compliant Island Communities Impact Assessment is a violation of the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to provide a comprehensive Social Impact Assessment constitutes a significant omission. These gaps inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for consideration.

Furthermore, the proposal directly contradicts the principles laid out in National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The lack of tourism impact modelling fails to provide evidence of any net economic benefit, and the cumulative effects of both offshore and onshore components have not been sufficiently assessed, obscuring impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent, failing to meet the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt. This engages the precautionary principle and complicates the ability to lawfully conclude that the impacts are acceptable.

The proposed development would also lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruptions to cultural and visual relationships will cause permanent effects that cannot be mitigated satisfactorily.

Considering these factors collectively, the application emerges as both procedurally and substantively unfit for determination. The combination of information deficiencies, policy contradictions, and unresolved environmental risks obstructs the ability to make a lawful, evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

To whom it my concern,

I became aware of the N4 proposal via local groups voicing their concerns.

As someone involved in Scottish tourism, I am surprised that such a proposal has been made in a location in close proximity for places famed for their natural beauty. Indeed VisitScotland often use images of the islands to do this. The addition of these turbines would scar the landscape and remove a USP of the islands.

Furthermore, I question who financially benefits from this proposal. A non Scottish/British company, with little skilled in the country to create substantial jobs will create a transient job market which has no benefit to locals or those on the mainland.

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

Regards,
[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: 49439740

Member of the public 1550

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. Concerns arise regarding the scale, proximity, and design of the project, questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for lawful determination. Essential environmental data is absent, baseline information is inconsistent and limited, and critical elements of the proposal remain unspecified. The flexible design framework used prevents a comprehensive understanding of potential significant effects, and the reliance on yet-to-be-defined mitigation measures raises doubts about their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which are not backed by robust evidence.

There are evident and substantive conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests necessary for consent and compromise the capacity of the competent authority to affirm the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces substantial concerns, especially with large turbines positioned near the shoreline, impacting landscape capacity, visual dominance, and overall environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear conflicts with policy indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent account of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to definitive turbine dimensions, layouts, or configurations, generates considerable uncertainty. This uncertainty hinders the application of a worst-case scenario analysis and compromises the integrity of the assessment. Consequently, the potential impacts presented may not accurately reflect the actual development, thereby preventing both the public and the competent authority from grasping the true scale of environmental effects.

Moreover, the application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these conditions implies that environmental harm will be addressed subsequently, which obstructs any meaningful assessment of effectiveness and residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation strategies must be clearly established prior to determination.

There are notable evidential shortcomings as well, including gaps in baseline data, methodological limitations, and a tendency to rely on assumptions instead of site-specific evidence. These issues result in uncertainty concerning 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, introducing scientific uncertainty that fails to comply with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal additionally does not demonstrate adherence to National Planning Framework 4, as it is unable to show that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The assessment of cultural heritage and community identity within the application fails fundamentally, as it adopts a reductive approach by treating heritage as a collection of isolated and static assets.

This perspective neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are merely characterised as static features within the assessment. This mischaracterisation ignores their ongoing use, significance, and the potential impact of development on their surrounding environments. Consequently, the evaluation of cultural effects remains incomplete, and the essential role these sites hold within community life is disregarded.

The assessment further fails to account for intangible cultural heritage, which includes vital components such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are central to the identity of the area, yet they are completely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinctive cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not align with established principles regarding participation in decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure exists in the absence of a compliant Island Communities Impact Assessment, a statutory requirement outlined in the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders lawful determination.

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

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, leaving the application insufficient for evaluating the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that

included focus groups with local residents, the complete report remains unpublished. This absence of information creates a significant evidential gap, hindering both the public and the competent authority from comprehending the full range of social risks highlighted by 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 stem from direct engagement with the community and are, therefore, not speculative in nature. Nevertheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and limits the ability to evaluate their importance within the decision-making framework.

There is also recognition that 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 considered in the main application or given the necessary weight. The withholding of the full Social Impact Assessment obscures the actual human and social costs tied to the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health effects is vital for developments of this magnitude, particularly where community character and functionality may be impacted. By not providing the complete dataset, the application fails to present a thorough evidential basis for evaluating the balance between benefits and harms.

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

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment process.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts related to the proposed turbines is materially

deficient, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The introduction of large-scale turbines in close proximity to the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application does not sufficiently represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and widely used coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape have not been properly conveyed in the assessment.

Moreover, there are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings risk understating the magnitude of visual impact, thus undermining the reliability of the assessment.

The assessment also neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, like the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting connected by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate likely environmental effects. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, hindering any meaningful assessment of their adequacy or effectiveness.

The deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether appropriate safeguards are established to respond to pollution incidents. This procedural risk undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation be assessed before consent; without such information, a lawful determination cannot be achieved. The application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts renders the assessment 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 evaluation of fisheries and marine life within the application lacks comprehensiveness, resulting in an inadequate analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine

ecosystem alongside an active fishing industry, yet the proposal does not convincingly show that these essential habitats and activities can be preserved or sustained without substantial disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is a notable absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of accommodating any additional pressure. This gap is critical, as displacement could lead to overfishing in other areas, potentially resulting in severe economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, it becomes impossible to fully grasp the implications for fisheries and local livelihoods.

Moreover, the proposed development presents considerable threats to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is anticipated to create disturbances over extensive distances, adversely affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application diminishes the seriousness of these effects, lacking adequate evidence to support such claims.

There is also an evident contradiction in the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that these impacts are negligible. This inconsistency undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm is at a level necessitating legal approval.

Additionally, the assessment does not adequately consider cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these interconnected effects is essential for determining the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short in demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which hinders any conclusion regarding its sustainability.

In summary, the combination of insufficient evidence concerning fishing displacement, an underestimation of acoustic effects, and internal inconsistencies collectively render the assessment incomplete and untrustworthy. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally inadequate, failing to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected; however, they are assessed in isolation, leading to a fragmented analysis that masks the actual extent of environmental and socio-economic consequences.

Onshore elements encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that runs through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, which obstructs a comprehensive understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be assessed collectively; the division between offshore and onshore aspects results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, both of which are subject to policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance strategies have been enacted. This absence highlights a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland can lead to the release of stored carbon, potentially generating a carbon debt that undermines the objectives of renewable energy initiatives. The application fails to adequately address this matter or to show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application provides no evidence that the requisite consents or processes have been started, which brings into question the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment of the project and the failure to demonstrate protection of peatlands, habitats, and land use interests contravene the National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's credibility.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of substantiation regarding environmental and land use

impacts render this aspect of the application incomplete and untrustworthy, obstructing a lawful determination.

TOURISM

The proposal lacks a thorough assessment of tourism impacts, which is critical given its significance to the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the economic contribution of the sector.

In recent years, tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Nevertheless, the application does not explore how the potential industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the resilience of the local economy. Without such analysis, it is impossible to ascertain whether this development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in attracting tourists, specifically the role of unspoiled landscapes and dark skies in enhancing visitor experiences and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the implications for a recognised and growing component of the local economy.

Given that the island community has limited economic diversification, the neglect to assess tourism impacts extends beyond this sector, affecting employment, local businesses, and the sustainability of the community. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in line with the requirements outlined in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. It also contradicts strategic goals that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to appraise the economic ramifications of the proposal.

The collective failure to quantify tourism impacts, analyse the environmental factors influencing visitor behaviour, and address the island's economic reliance results in a significant evidential gap. This situation hampers a comprehensive evaluation of economic effects and reinforces the notion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant misalignment with the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application mirrors the key issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being put forward under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape preservation, and the wellbeing of communities, the application falls short in critical areas.

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

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

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

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

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

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

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

Additional Comments

We live in the area that will be affected with the turbines. Currently there are a few much much smaller turbines people have on their own land a number of houses away from our house and those can be heard clearly on a nice day or depending which way the wind is going. In such a peaceful part of the island it is definitely noticeable even when you aren't looking at it you are hearing it. This scale of turbines will clearly have a much bigger impact.

The people that are going to be living with the impact are not benefitting from it and what affect will it have on our health and our children's health is not fully known!

This should never have been approved. I am not against finding better ways to source power however the impact of these turbines will be forever. The fact that they will be in place after their life span should not be allowed either. A lot of fishing boats go by that area and I dread to think if the impact that will have on both the marine life and the birds of the area.

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: ABF4BCD2

Member of the public 1551

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns have been raised regarding the proposal's scale, proximity, and design in relation to compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a legal determination. There is missing critical environmental data, while the baseline information provided is both limited and inconsistent, with important elements of the proposal remaining undefined. The application employs a flexible design framework, which obscures the understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures hampers any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering the assertions of negligible or non-significant effects unsubstantiated by solid evidence.

There are evident and significant conflicts with established policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory tests necessary for obtaining consent and challenge the capacity of the relevant authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines planned in close proximity to the shoreline, raises major issues regarding landscape capacity, visual impact, and overall environmental consequences. In summary, the lack of adequate information, the dependence on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a reliable account of the potential environmental effects of the proposed project. The approach of employing a flexible Project Design Envelope, which does not commit to precise turbine sizes, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity and means that the predicted impacts may not accurately reflect the development as it will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental impacts.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that any environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of their effectiveness or assessment of residual impacts. This deferral of essential information to stages post-consent is procedurally unacceptable and runs counter to the intentions of the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly identified prior to determination.

There are also substantial evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These issues yield uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out 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 adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if adequate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data result in the Environmental Impact Assessment Report being both unreliable and incomplete. These flaws inhibit a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a rigorous assessment of alternatives, failing to meet the necessary standards set by the Environmental Impact Assessment regime. Instead of offering a clear, structured comparison of viable alternatives based on their environmental impacts, it provides a narrative on the project's development. This method does not effectively demonstrate that less harmful options have been

adequately identified, evaluated, and chosen over more damaging alternatives.

Furthermore, there is a notable absence of transparent, evidence-based comparisons concerning alternative offshore sites, varying scales of development, or different design configurations. Specifically, the application does not show that the developer has genuinely considered placing the turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in impact assessment, the failure to include such an analysis obstructs any conclusion that the proposed location is the least damaging available.

The shortcomings also apply to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avert or lessen impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate that the project has not applied mitigation by design and instead relies on post-design mitigation efforts.

Consequently, the application does not demonstrate that environmental damage has been minimised through careful site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially regarding the safeguarding of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a material shortcoming that contributes to the overarching conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, particularly concerning the ecological receptors present in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data remains inadequate, while the methodologies employed fail to accurately document the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A significant shortcoming involves the European Protected Species of otters, for which the application does not sufficiently recognise or assess their use of coastal regions for both foraging and movement. The neglect of their core foraging range and behavioural patterns has led to an inadequate evaluation of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises

any conclusions drawn regarding the absence of significant effects on this species.

The assessment also encounters shortcomings regarding basking sharks, as it relies heavily on aerial surveys that introduce significant detection bias, particularly in the challenging conditions of the Atlantic. This reliance likely leads to an underestimation of the sharks' presence, especially when contrasted with established land-based observations showing frequent utilisation of these waters. The failure to integrate or properly consider such data contributes to an incomplete baseline, thereby undermining the reliability of the presented conclusions.

These methodological flaws result in findings of negligible or non-significant effects that are based on assumptions rather than substantial evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. Such gaps foster uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set out in the Environmental Impact Assessment regime and the National Planning Framework 4, as protected species have not been accurately identified or assessed. The degree of uncertainty introduced obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application does not sufficiently demonstrate that these species will not be adversely affected, particularly as it is situated within key foraging areas and migratory pathways. The ornithological assessment, however, is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to robustly evaluate the implications of displacement, collision risk, or habitat loss.

There exists a critical contradiction within the application, where the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the available evidence.

The assessment lacks sufficient proof 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 considered, and reliance on modelling approaches introduces uncertainty, especially for declining species such as Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate mortality rates, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional and considerable risk, effectively acting as a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately 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 data deficiencies and modelling constraints, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, thus preventing a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is alarmingly inadequate, notably failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application employs a reductive method, viewing heritage merely as a collection of isolated, static entities instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Particularly troubling is the treatment of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active places for burial and spiritual practices, yet they are mischaracterised as static features, ignoring their continued significance and the implications of development on their settings. This fundamental misunderstanding leads to an incomplete assessment of cultural effects and neglects the essential role these sites play in community life.

Moreover, there is a glaring omission in the consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring

relationship between the community and the coastal environment. These aspects are crucial to the area's identity yet are completely overlooked in the assessment. This oversight prevents a comprehensive understanding of the cultural impacts stemming from the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity and bears characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of genuine engagement undermines the credibility of the assessment and overlooks established principles of participation in matters affecting cultural and environmental interests.

A significant procedural shortcoming is the absence of a valid Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to analyse the social, cultural, and economic impacts on the island community. This single omission renders the determination process unlawful.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The failure to incorporate both tangible and intangible heritage, along with the disregard for living cultural practices, constitutes a clear violation of policy mandates.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and legal obligations culminates in a substantial evidential gap. The cultural implications of the proposed development have not been adequately examined, and the application falls short of providing a solid foundation for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the 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 proposed introduction of large-scale turbines near the West Lewis coastline would fundamentally alter the landscape. This area is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The assessment of the potential seascape, landscape, and visual impacts is deficient. It fails to represent the scale of change or the sensitivity of the environment adequately. The turbines would create a continuous industrial presence that would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the naturalness and remoteness of the region.

Methodological concerns exist regarding the selection and presentation of visual viewpoints. It appears that some viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, compromising the reliability of the assessment.

Moreover, the assessment overlooks the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are linked visually and spatially to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence and

leads to an incomplete evaluation of the impacts on their cultural significance and setting. The proposed industrialisation of the seascape would sever these connections, disrupting how heritage assets are experienced in relation to the natural horizon. This change represents a broader cultural and spatial harm that the application has not adequately addressed.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The magnitude of change is incompatible with requirements to safeguard landscape character and visual amenity as well as the setting of culturally significant sites. The lack of a robust worst-case scenario assessment undermines any claim of compliance with policy.

Additionally, the identified impacts cannot be effectively mitigated. The height, scale, and proximity of the turbines would ensure that their presence is dominant and unavoidable. The resulting changes would be fundamental and permanent, rather than manageable to acceptable levels through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposed development involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet the assessment of construction and pollution risks lacks the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on future mitigation and contingency measures that are intended to be established post-consent. This approach raises concerns as it hinders any meaningful assessment of the adequacy or effectiveness of these undefined measures.

Given the sensitivity of the receiving environment, which includes the West Lewis coastline with its clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, this reliance on future planning is particularly troubling. The application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills but fails to provide adequate information on how these risks will be prevented, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes resulting from the disturbance of the seabed and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. Furthermore, this uncertainty extends to potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a stage after consent has been granted, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts result in a materially incomplete assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is insufficient.

FISHERIES AND MARINE LIFE

The assessment of the proposed development raises significant concerns regarding its impact on both fisheries and marine life. The waters off the West Lewis coast are not only home to a diverse marine ecosystem but also support an active fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from substantial disruption.

A critical flaw within the application is the unsubstantiated assumption that fishing activities can simply be relocated without adverse consequences. There is no evidence provided to suggest that alternative fishing grounds are available or capable of accommodating the additional pressures that displacement would create. This oversight is particularly troubling, as it could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended period is expected to cause widespread disturbance, which may affect species such as dolphins. Alarmingly, the potential disruption to a significant portion of the local bottlenose dolphin population is downplayed in the application, lacking adequate supporting evidence.

There exists a noteworthy inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction calls into question the

credibility of the assessment and raises alarms about compliance with the Habitats Regulations, particularly in situations where anticipated harm necessitates legal authorisation.

Moreover, the cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities, have not been adequately considered. 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 comply with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal constitutes sustainable development.

In summary, the insufficient evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment collectively render it incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking and does not fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely linked but assessed separately, leading to a fragmented evaluation that masks the true extent of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities require excavation through areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the disconnection between offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal presents substantial risks to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been

thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance, as the disturbance of 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 critical issue or prove that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising serious doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment. The Environmental Impact Assessment does not address the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors, which is a significant oversight given the importance of dark skies to the region and to emerging tourism sectors like astro-tourism.

Furthermore, there is a complete lack of evaluation concerning the effects 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, which can result in disorientation and increased collision risks. The application fails to include any assessment of lighting impacts or a phototaxis study, neglecting to evaluate how aviation lighting might affect these species or contribute to increased mortality rates.

This critical omission is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been considered. The absence of site-specific night-time data creates a significant gap in understanding ecological

impacts.

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse impacts beyond reasonable scientific doubt has not been met, engaging the precautionary principle and obstructing a lawful determination.

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

In summary, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The application significantly underrepresents the potential impacts on tourism, a crucial sector for the Isle of Lewis economy. This area's tourism thrives on its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. With 86% of visitors attracted by the scenery, the proposal does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has shown remarkable growth, with its contribution rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and the deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the region. Without such crucial analysis, it remains unclear if the proposed development would result in a net economic benefit or if it would jeopardise an already thriving sector.

Furthermore, the evaluation fails to account for the critical role that environmental quality plays in tourism, particularly regarding unspoiled landscapes and dark skies which are vital for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the effects on a recognised and growing segment of the local economy.

Considering the limited economic diversification within this island community, the oversight in assessing tourism impacts has broader implications for employment, local enterprises, and community sustainability. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately examined, as required by the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the economic dependency of the island culminates in a significant evidential gap. This deficiency hinders a comprehensive evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the principal issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of proposed industrialisation was deemed unacceptable. Despite being presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

There are critical gaps within the evidential basis provided for this proposal, including an incomplete assessment of baseline data and the use of an unspecified design envelope. Additionally, there is a reliance on unverified mitigation measures and the absence of essential impact assessments regarding nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations as per the Islands (Scotland) Act 2018. Furthermore, the omission of a comprehensive Social Impact Assessment constitutes a substantial material gap. These inadequacies inhibit the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not establish that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, as there is no modelling of tourism impacts. The cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially

significant. Incomplete and internally inconsistent assessments regarding marine ecology, seabirds, protected species, and marine mammals fail to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and precludes a lawful conclusion that the impacts of the proposal are acceptable.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The magnitude of information deficiencies, alongside policy inconsistencies and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

Finally, the proposals will be devastating for the unspoiled scenery of Lewis. The large scale turbines will undoubtably spoil the beautiful landscape and have a significant impact upon this unique area.

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: A59F6ADA

Member of the public 1552

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 reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data severely compromise the Environmental Impact Assessment Report, making it unreliable and incomplete. This combination of deficiencies leads to an assessment that cannot lawfully or robustly evaluate environmental effects, thereby leaving the competent authority unable to make an informed decision based on the provided information.

The application places undue emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these circumstances means that any environmental harm is intended to be addressed later, which hampers the ability to effectively evaluate these measures or assess any residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable, contradicting the essential aim of the Environmental Impact Assessment regime that mandates clear establishment of significant effects and mitigation prior to any determination.

There exist substantial evidential deficiencies, including missing baseline data and limitations in methodology, along with an over-reliance on assumptions rather than site-specific evidence. These issues generate uncertainty around the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information inhibits a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that cannot be aligned with statutory requirements.

The application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been fully assessed or that appropriate safeguards are in place.

The deficiencies in the Environmental Impact Assessment Report, stemming from the flexible Project Design Envelope that lacks commitment to specific turbine dimensions and configurations, introduce significant uncertainty. This uncertainty ultimately undermines the integrity of the assessment and obscures the actual environmental impacts from both the public and the competent authority, leaving a critical gap in understanding the true extent of potential effects from the development.

ASSESSMENT OF ALTERNATIVES

The proposed development has significant deficiencies in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison of realistic alternatives based on environmental effects, the application presents merely a narrative account of the project's evolution. This lack of analysis does not show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a clear absence of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not sufficiently considered placing turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impacts, the failure to conduct this analysis precludes any conclusion that the proposed siting is the least damaging option.

These inadequacies also extend to cable routing and landfall assessments, where insufficient evidence has been provided that alternative routes were explored to avoid or minimise impacts on sensitive receptors. Areas of cultural and spiritual significance, such as Barvas Cemetery, have not been adequately addressed. The lack of a clear avoidance strategy and comparative analysis indicates that there has been no application of mitigation by design, relying instead on post-design mitigation measures.

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

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission that contributes to the overarching conclusion that the application has not undergone adequate evaluation 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 and fails to deliver a complete understanding of the ecological receptors present. This region is recognised as a biologically active and sensitive marine system, yet the baseline data provided is insufficient, and the methodologies employed do not adequately capture species presence, behaviours, and habitat usage. Consequently, the assessment lacks a robust evidential basis for assessing potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents significant deficiencies in its ornithological assessment, which is flawed due to substantial gaps in evidence and internal contradictions that challenge its conclusions. Situated on the west coast of the Isle of Lewis, an area that supports seabird populations of international importance, the proposal fails to adequately demonstrate that these species, many of which are already in decline, will not experience adverse impacts. The proposed development is located within crucial foraging areas and migratory corridors, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these birds.

A notable contradiction within the application arises when the developer asserts that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is intended for situations where significant harm is anticipated. This inconsistency casts doubt on the validity of the assessment and suggests that its conclusions lack support from the evidence provided. The assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The critical nature of these feeding

grounds is inadequately considered, and reliance on modelling methods adds uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Moreover, the methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the limited understanding of behavioural responses.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a vibrant cultural landscape in which environment, language, tradition, and community are deeply interwoven. The application adopts a simplistic view, treating heritage as isolated, static assets rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is found in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely static features; they are active locations for burial and spiritual practices. However, the assessment incorrectly categorises them, overlooking their ongoing significance, usage, and the implications of development on their surroundings. This flawed interpretation leads to an inadequate evaluation of cultural effects and dismisses their importance in community life.

Moreover, the application neglects the assessment of intangible cultural heritage, which includes the Gaelic language, local traditions, and the enduring relationship

between the community and the coastal environment. These aspects are vital to the area's identity but are entirely omitted from the assessment, marking a substantial oversight. Without acknowledging these elements, the cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity with characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and fails to adhere to established principles of participation in matters that affect cultural and environmental interests.

There is a critical procedural failing in the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The omission of this assessment means that the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic ramifications for the island community. This alone undermines lawful determination.

From a policy perspective, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy requirements.

When considered collectively, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The application does not adequately assess the cultural impacts of the development, nor does it provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment represents a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's own research. Summaries indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore grounded in reality. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the capacity to determine their significance in the decision-making process.

Moreover, there is a clear perception that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer's findings. Despite the recognition of these impacts, they have not been adequately integrated into the main application or given appropriate weight, as the withholding of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this nature, especially when community character and functioning are at stake. The application's failure to provide the complete dataset results in an incomplete evidential basis for assessing the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the available evidence suggests existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without 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 conclusion, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts renders the assessment incomplete and unreliable. This ultimately prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to be supported.

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 West Lewis coastline features clean coastal waters and important habitats that are vulnerable to disturbance and contamination. The proposal, which involves significant seabed preparation and installation activities in a high-energy Atlantic environment, lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent is granted. This approach raises concerns, as it prevents a thorough assessment of these measures' adequacy and effectiveness.

The application acknowledges various risks, including sediment mobilisation and accidental chemical or oil spills, yet it does not offer sufficient detail on how these issues will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts, which could affect sensitive marine species and

habitats already identified in the broader assessment.

The omission of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent, the application hampers the evaluation of whether appropriate safeguards exist to address pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation measures prior to granting consent; without this information, a lawful determination cannot be reached. The application also 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 surrounding potential impacts collectively result in a materially deficient assessment. These issues hinder a robust evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application does not adequately evaluate the impacts on fisheries and marine life, presenting significant risks to both the ecosystem and the local fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector, yet the proposal fails to establish how these vital resources can be preserved amidst development activities without causing major disruptions.

One critical concern is the assumption that fishing activities can be relocated without any negative effects. The application lacks supporting evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressures of displaced fishing efforts. This gap in information is crucial, as it raises the possibility of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and community livelihoods remain poorly understood due to this lack of a clear and evidence-based assessment.

Furthermore, the proposed development poses notable risks to marine species, especially due to the underwater noise generated during construction activities. High-energy hammer piling is anticipated to cause disturbances across extensive distances, which could adversely affect local species, including dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises these effects without adequate evidence to support such claims.

There is also a troubling inconsistency within the application regarding the necessity of licenses for actions that may harm European Protected Species. While the potential for

such harm is acknowledged, impacts are simultaneously characterised as negligible. This contradiction undermines the assessment's credibility and raises serious concerns about adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts that arise from multiple sources of pressure, such as habitat disruption, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning onshore infrastructure is fundamentally lacking, failing to account for the comprehensive impacts stemming from this single integrated project. The connection between the offshore turbines and the onshore works is crucial; however, the evaluation treats these elements as distinct entities. This separation leads to a disjointed analysis that obscures the true magnitude of environmental and socio-economic repercussions.

Significant onshore works are involved, such as cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, excavation activities across regions of deep peat, especially within Barvas Moor—which serves as an important carbon store and ecologically sensitive habitat—are part of this project. The current application lacks a thorough assessment of these impacts, hindering a full comprehension of the environmental footprint associated with the project.

Moreover, the application’s choice to exclude or postpone the assessment of onshore impacts impedes an accurate evaluation of cumulative effects. The Environmental Impact Assessment mandates that all elements of a project are considered in unison; however, the disjointed approach to offshore and onshore components means the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Risks to sensitive habitats, including machair systems and peatland environments,

which are afforded policy protection, are also significant. The application fails to demonstrate a comprehensive assessment of the impacts on these habitats or to indicate that appropriate avoidance measures have been implemented. This gap in evidence regarding biodiversity protection is concerning.

Additionally, the proposal presents issues relating to carbon balance. The disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this critical matter or provide evidence that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal entitlements. There is insufficient evidence in the application to confirm that the required consents or procedures have been initiated, which raises doubts about the deliverability and lawful execution of the project.

From a policy perspective, the failure to assess the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further detracts from the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The assessment fails to address the impacts of dark skies and nocturnal wildlife, marking a significant omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment.

Additionally, the application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the region's identity and the emerging astro-tourism sector heightens the significance of this oversight, leading to a clear gap in the overall landscape and environmental assessment.

More importantly, there is a lack of assessment concerning the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application fails to include any lighting

impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the associated risk of increased mortality.

This lack of evaluation is worsened by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or the risks that accompany it. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this has not been assessed. Consequently, the absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecology.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot adequately support a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is significantly lacking and does not address the economic and social implications for a vital sector of the Isle of Lewis economy. Tourism heavily relies on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application recognises that 86% of visitors are attracted by scenery, it neglects to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contributions made by tourism.

Since 2017, tourism on the island has seen remarkable growth, rising from £65 million to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the local economy. However, the application does not examine how the potential industrialisation of the seascape and deterioration of environmental quality may impact Tourism Gross Value Added or the broader economic resilience of the area. Without this critical assessment, it remains unclear whether the development would yield a net economic benefit or threaten an established and expanding sector.

Furthermore, the analysis omits consideration of the importance of environmental quality in bolstering tourism. Unspoiled landscapes and dark skies are essential to enhancing visitor experiences and fostering new markets like nature-based tourism and

astro-tourism. The lack of a Dark Skies Assessment exacerbates these shortcomings, resulting in a considerable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community characterised by limited economic diversification, the oversight regarding tourism impacts poses broader risks 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 appraised, which is required under the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and the disregard for the island's economic dependence contribute to a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, presented under a supposedly stronger policy framework, has not adequately addressed the essential considerations of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical deficiencies exist in the evidential basis for the proposal. There are notable gaps in baseline data, a reliance on an undefined design envelope, unspecified mitigation measures, and significant omissions in key impact pathways related to nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, preventing a comprehensive understanding of potential significant effects or residual impacts.

Additionally, the application exhibits procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment is a serious omission. These inadequacies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Conflicts with National Planning Framework 4 are evident. The proposal fails to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, and does not satisfactorily address health and wellbeing impacts or provide evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals lack completeness and are inconsistent in parts. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy contradictions, and unresolved environmental risks obstructs a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or utilise the appropriate regulatory measures to compel the submission of the necessary missing information.

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

Additional Comments

This development is to close to the Island. Industrialisation on this scale is inappropriate. Energy generation should be closer to the end user.

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: DAD20A75

Member of the public 1553

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment regulations. The objection arises from a review of the Environmental Impact Assessment Report and its supporting documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the proposal suggest it may not comply with statutory requirements, national policy, or sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is inconsistent and limited, and essential elements of the proposal remain unspecified. The employment of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

There are also significant policy conflicts. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not prove that it can meet national mandates to protect biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal’s acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious concerns about landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, the dependence on undefined mitigation, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must apply in these circumstances.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or dependable evaluation of the potential

environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific dimensions, layouts, or configurations of turbines, generates substantial uncertainty. This ambiguity undermines the assessment's integrity and inhibits a consistent application of a worst-case scenario, ultimately preventing both the public and the competent authority from grasping the full extent of environmental effects that may arise from the development.

Moreover, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be mitigated at a later stage obstructs any meaningful evaluation of the effectiveness of those measures or the assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation strategies must be clearly established prior to determination.

Additionally, significant evidential gaps exist, including deficiencies in baseline data and methodological limitations, as well as reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential standards 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 comply with National Planning Framework 4, which includes mandates for biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In conclusion, the combination of reliance on an undefined design envelope, absence of clearly articulated mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

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 evaluation of marine ecology and protected species is significantly lacking, failing to deliver a thorough and dependable insight into the ecological receptors present in the West Lewis coastal environment. This area is known for its sensitivity and biological activity; however, the baseline information is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, or habitat utilisation. Consequently, the assessment does not furnish a solid evidential foundation for impact evaluation.

The assessment's shortcomings are particularly evident in its treatment of otters, a European Protected Species. The application inadequately acknowledges their active use of coastal zones for foraging and movement. By neglecting to consider their primary foraging range and behavioural patterns, the potential impacts of construction

disturbance, noise, and increased human activity remain poorly assessed. This oversight diminishes the validity of any conclusions regarding significant effects on this species.

In addition, the assessment of basking sharks suffers from methodological flaws, notably the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underreport their presence, especially when compared to established land-based observations that indicate their frequent use of these waters. The disregard for such crucial data results in an incomplete baseline and compromises the reliability of the conclusions drawn.

These methodological issues lead to findings of negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of adequate baseline data hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced prohibits 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 unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a comprehensive evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development raises significant concerns regarding the reliability of its ornithological assessment, which is marked by notable gaps in evidence and inconsistencies. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not adequately demonstrate that these species will not be adversely affected by the proposed development. The turbines are positioned within critical foraging areas and migratory routes, yet the assessment fails to sufficiently evaluate the risks associated with displacement, collision, and habitat loss.

A critical inconsistency exists in the application, as the developer asserts that there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack the necessary evidential support. Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis

Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used may underestimate potential mortality rates, especially in light of incomplete baseline data and an insufficient understanding of species behaviour.

The placement of turbines within a recognized migratory corridor presents additional significant risks, effectively forming a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate 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 does not fulfil the evidential standard needed to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders a lawful conclusion in favour of consent unattainable.

Moreover, the identified deficiencies signify a failure to adhere to the National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected puts the proposal at odds with national policy.

In summary, the assessment is compromised by internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of the potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a vibrant cultural landscape in which environment, language, tradition, and community are deeply interwoven. The application adopts a simplistic view, treating heritage as isolated, static assets rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is found in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely static features; they are active locations for burial and spiritual practices. However, the assessment incorrectly categorises them, overlooking their ongoing significance, usage, and the implications of development on their surroundings. This flawed interpretation leads to an inadequate evaluation of cultural effects and dismisses their importance in community life.

Moreover, the application neglects the assessment of intangible cultural heritage,

which includes the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity but are entirely omitted from the assessment, marking a substantial oversight. Without acknowledging these elements, the cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity with characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and fails to adhere to established principles of participation in matters that affect cultural and environmental interests.

There is a critical procedural failing in the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The omission of this assessment means that the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic ramifications for the island community. This alone undermines lawful determination.

From a policy perspective, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy requirements.

When considered collectively, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The application does not adequately assess the cultural impacts of the development, nor does it provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The analysis of social impacts, health, and wellbeing associated with the proposal is fundamentally flawed and lacks the requisite transparency for a lawful assessment. Although the developer commissioned a Social Impact Assessment that included engagement with local residents through focus groups, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks highlighted by the developer's own research.

Summaries that are available reveal that local residents are currently facing notable levels of stress, anxiety, and concern linked to the proposal's scale and proximity. These effects stem from direct interactions and are therefore based on concrete evidence rather than speculation. The failure to make the complete assessment available undermines rigorous scrutiny of these findings and restricts the capacity to assess their relevance in the decision-making process.

Moreover, there is a notable perception that the proposal poses a direct threat to community identity and cohesion, with the developer's own findings acknowledging a potential "cultural loss." Despite this, such impacts have not been sufficiently integrated into the main application nor afforded the appropriate consideration. The absence of the complete Social Impact Assessment thus conceals the actual human and social costs of the proposed development.

This lack of transparency has serious implications for 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 functionality are at risk. By withholding the complete dataset, the application fails to establish a comprehensive evidential foundation necessary for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not illustrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; however, the evidence at hand suggests there are existing adverse effects that remain undisclosed. Without access to the full assessment, the demonstration of compliance with this policy is unattainable.

The procedural ramifications of this situation 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 significant omission within the application and a failure to satisfy the evidential obligations of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of pre-existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy precludes a lawful determination and reinforces the position that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

of impact or its significance within the context of this sensitive landscape.

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans and defined mitigation measures leads to a materially deficient assessment of construction and pollution risks. The proposal, which entails substantial seabed preparation and installation works within a high-energy Atlantic environment, does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be prepared after consent, thereby hindering a meaningful evaluation of their adequacy or effectiveness.

There is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats, which have already been identified as sensitive in the wider assessment.

The proposal also acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, yet it fails to provide sufficient details on how these risks will be prevented, controlled, or monitored. The sensitivity of the receiving environment, including the West Lewis coastline that supports clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, further heightens these concerns.

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

From a regulatory perspective, this deferral of critical environmental safeguards is inconsistent with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent; if such information is lacking, a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies identified within the assessment, including the lack of detailed management plans, uncertainty regarding potential impacts, and absence of defined mitigation measures, collectively illustrate that the evaluation of construction and pollution risks is inadequate and further support the assertion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant shortcomings in its assessment of onshore infrastructure, which is critical to understanding the full impact of what is fundamentally an integrated project. The offshore turbines and the associated onshore works are interdependent, yet they have been evaluated separately. This division results in a fragmented analysis that fails to capture the comprehensive environmental and socio-economic repercussions.

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. Notably, the excavation required for these

works occurs in areas of deep peat, particularly in Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's environmental footprint.

By postponing or omitting the evaluation of onshore impacts, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively, yet the segregation of offshore and onshore components obscures the total impacts on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application fails to adequately demonstrate that the impacts on these habitats have been fully considered or that effective avoidance measures have been applied, leading to a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbing peatland results in the release of stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this critical issue or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on the project's feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project as a whole, alongside the inability to ensure protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation of impacts further diminishes the reliability of 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 aspect of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which is visible over long distances, will create an intrusive "wall of light" effect across the western horizon and will fundamentally alter

the night-time environment.

Moreover, 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 significant given the value of dark skies to the area's identity and the developing tourism sector focused on astro-tourism. Consequently, the neglect of these factors creates a substantial gap in the overall landscape and environmental assessment.

Importantly, the proposal does not include any evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and increased risk of collision. The absence of a lighting impact assessment or phototaxis study means that there has been no examination of how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this vulnerability has not been evaluated. The lack of site-specific night-time data presents a critical shortfall in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural environments and environmental quality. It also undermines the more comprehensive assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

TOURISM

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

Tourism has experienced remarkable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality would impact Tourism Gross Value Added or the wider economic resilience. Without such analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise a well-established and growing sector.

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

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

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

In sum, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency culminates in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The 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 am dismayed that the proposal for this wind farm has been made with such scant regard for the residents of North Lewis and their quality of life as well as all those who visit the area.and contribute to its economy and community.

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: D456B768

Member of the public 1554

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, clear, or dependable overview of the anticipated environmental repercussions of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates a considerable degree of uncertainty. This uncertainty undermines the reliability of the assessment, meaning that the potential impacts may not accurately reflect the development that will ultimately be built. Consequently, both the public and the competent authority are left without a proper understanding of the true scope of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application significantly falls short in its assessment of alternatives, failing to meet the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned evaluation of viable alternatives concerning their environmental effects, it merely presents a narrative of the project's

evolution. This inadequacy prevents the identification, assessment, and selection of less harmful options in favour of more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the developer has not convincingly explored the possibility of positioning turbines further offshore, which could potentially alleviate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to the shore in evaluating impacts, further emphasises the necessity of such analysis. The absence of this examination undermines any assertion that the proposed siting constitutes the least damaging option.

In addition, the issues extend to the assessment of cable routing and landfall, where insufficient evidence indicates that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including significant cultural and spiritual sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the approach has not incorporated mitigation by design, relying instead on post-design measures.

As a consequence, the application does not adequately demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it is impossible to determine that the proposal aligns with sustainable practices or complies with relevant policies.

From a policy standpoint, this deficiency severely undermines adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a significant omission that ultimately leads to the conclusion that the application has not undergone sufficient scrutiny and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant shortcoming involves otters, a species afforded protection under European law, as the application inadequately acknowledges and assesses their active utilisation of coastal regions for foraging and movement. This oversight regarding their core foraging range and behaviour results in an insufficient evaluation of the potential

effects stemming from construction disturbances, noise, and heightened activity. As a result, the conclusions regarding the absence of significant effects on this species are fundamentally undermined.

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

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

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

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

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 application demonstrates a fundamental inadequacy in its assessment of cultural heritage and community identity, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. It adopts a reductive view, treating heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

There is a significant oversight in the assessment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites function as active places for burial and spiritual practice, yet they are mischaracterised as static features. This misrepresentation fails to consider their continued use and meaning, as well as the development's impact on their surroundings. Such an inadequate portrayal leads to an incomplete evaluation of cultural effects and disregards their integral role in community life.

Moreover, the application neglects to address intangible cultural heritage, such as the Gaelic language and traditions, alongside the enduring relationship between the community and its coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, indicating a serious lapse. Without incorporating these elements, the true cultural impact of the development remains obscured.

Concerns extend to community rights and engagement, particularly for the Gaelic-speaking population, which possesses a distinct cultural identity akin to that of an Indigenous People. However, the absence of a Free, Prior and Informed Consent process undermines the credibility of the assessment, neglecting essential principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw lies in the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The omission of this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, making a lawful determination impossible.

From a policy perspective, these failures place the proposal at odds with the 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 recognise living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a notable evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application lacks a solid foundation for understanding the true cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development introduces large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This project threatens to create a continuous industrial presence that would fundamentally alter the landscape, leading to a permanent transformation that could not be reversed. The assessment of potential seascape, landscape, and visual impacts is critically deficient, failing to adequately convey the extent of this visual change and the sensitivity of the environment.

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

the visual impact, calling into question the reliability of its findings.

Furthermore, the application overlooks the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment inadequately treats these sites as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impact on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This change represents not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application. From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural places and historic assets. The scope of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. This change is substantial and permanent, incapable of being reduced to an acceptable level through mitigation efforts. Collectively, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, resulting in an unreliable evaluation that reinforces the conclusion that the proposal is not compatible with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment provided regarding construction and pollution risks is notably deficient, lacking the essential detail needed to properly evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will only be developed after consent, which hampers any meaningful assessment of their adequacy or effectiveness.

The reliance on these vague future measures raises serious concerns, particularly due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it falls short in providing adequate details on how these risks will be prevented, managed, or monitored.

Furthermore, there is considerable uncertainty surrounding the magnitude and

behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether effective safeguards are available to address pollution incidents. This procedural risk weakens the competent authority's capability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the postponement of key environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is issued, and when such information is absent, a lawful determination cannot occur. Additionally, the application does not adequately demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment seriously flawed. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The 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.

DARK SKIES AND NOCTURNAL WILDLIFE

The assessment fails to address the impacts of dark skies and nocturnal wildlife, marking a significant omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment.

Additionally, the application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the region's identity and the emerging astro-tourism sector heightens the significance of this oversight, leading to a clear gap in the overall landscape and environmental assessment.

More importantly, there is a lack of assessment concerning the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application fails to include any lighting

impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the associated risk of increased mortality.

This lack of evaluation is worsened by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or the risks that accompany it. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this has not been assessed. Consequently, the absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecology.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot adequately support a lawful determination.

TOURISM

The assessment of tourism impacts is critically inadequate, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, nearly untouched landscape, dark skies, and overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how extensive offshore infrastructure might affect visitor numbers, behaviours, or the overall economic contribution of this sector.

The tourism sector has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island’s economy. However, the application does not model how the industrialisation of the seascape and a decline in environmental quality would impact the Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains unclear if the development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment inadequately considers the importance of environmental quality in supporting tourism, especially the value of pristine landscapes and dark skies to visitor experiences and burgeoning markets like nature-based tourism and astro-

tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the impacts on a recognised and flourishing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the requirement to establish net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This hinders a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development, as required by statutory duties, national policy, and evidential standards. It mirrors the key concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. This new application, however, is presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided for the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Additionally, the reliance on unspecified mitigation measures and the exclusion of critical impact pathways—such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism—highlight the incompleteness of the Environmental Impact Assessment. Consequently, this assessment does not allow for a comprehensive understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to present the full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues collectively render the application unfit for determination.

In addition, the proposal contradicts National Planning Framework 4. It does not

adequately protect biodiversity, natural places, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further fails to establish a net economic benefit. The cumulative effects of both offshore and onshore components have not been properly assessed, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land inadequately understood.

The environmental risks associated with this proposal remain uncertain and could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent in places. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

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

Overall, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or utilise the appropriate regulatory measures to compel the submission of the missing information.

In light of these considerations, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

N4 conflicts with the Development Plan and NPF4
- N4 harms protected seabirds
- N4 harms vulnerable and protected marine life
- N4 harms humans living in close proximity
- N4 harms visual amenity
- N4 conflicts with and threatens tourism
- N4 harms dark skies
- N4 conflicts with transport capacity
- N4 harms heritage and other historic sites
- N4 causes cumulative long-term harm
- N4 conflicts with biodiversity policy
- N4 threatens community identity, tradition, and distinct character of the West Side

I support transitions to renewables but this is too big for a small island and too close to the land

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: 3930D1DF

Member of the public 1555

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 lacks completeness and transparency, failing to deliver a dependable account of the anticipated environmental consequences of the proposal. One significant concern is the flexible Project Design Envelope that

does not commit to specific dimensions, layouts, or configurations of turbines. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not truly represent the final development, obstructing both the public and the competent authority from grasping the actual environmental effects involved.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be managed at a later stage undermines meaningful evaluation of their effectiveness and precludes thorough assessment of residual impacts. This deferral of crucial information to stages following consent is procedurally unacceptable and contradicts the core purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

There are also notable gaps in evidence, which include shortcomings in baseline data, methodological limitations, and the use of assumptions in lieu of site-specific evidence. Such deficiencies lead to uncertainty concerning the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, 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, leaving the competent authority unable to make an informed determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The application submitted does not satisfy the necessary requirements of the Environmental Impact Assessment regime and the National Planning Framework 4 due to significant deficiencies in the assessment of marine ecology and protected species. This inadequacy stems from the failure to fully identify and assess the presence and behaviour of ecological receptors within the West Lewis coastal environment, a region known for its biological activity and sensitivity. The baseline data provided is

incomplete, and the methodologies employed do not accurately reflect species presence, behaviour, and habitat use.

A particularly notable gap in the assessment is the treatment of otters, a species protected under European law. The application neglects to adequately acknowledge their active use of coastal areas for foraging and movement. Consequently, the evaluation fails to consider the core foraging range and behavioural patterns of otters, leading to an insufficient assessment of potential impacts from construction disturbance, noise, and increased activity. This oversight significantly undermines any conclusions drawn regarding the absence of significant effects on this species.

Additionally, the evaluation of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic as it introduces a significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the actual presence of basking sharks, especially when juxtaposed with land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or adequately address such data culminates in an incomplete baseline that diminishes the reliability of the conclusions drawn.

Due to these methodological flaws, any conclusions suggesting negligible or non-significant effects rest on mere assumptions rather than on solid evidence. The lack of sufficient baseline data further impedes a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This scenario engenders uncertainty about the actual risks posed to marine species and habitats.

Considering these factors collectively, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species and confirm that the application lacks a sufficient evidential foundation. Thus, in light of the introduced uncertainties that prevent the exclusion of adverse effects beyond reasonable scientific doubt, consent cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with the application is fundamentally flawed and exhibits considerable gaps in evidence and internal inconsistencies that detract from its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. There is a failure to robustly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer claims that there are no significant adverse effects while also presenting a Habitats Regulations

derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the assessment's reliability and indicates that the conclusions presented lack adequate support from the underlying evidence.

Moreover, the assessment does not sufficiently prove that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches contributes to uncertainty, especially for species like Kittiwakes and Fulmars that are in sharp decline. The methodologies employed are likely to underestimate mortality, particularly in situations where baseline data is incomplete and the behavioural responses of species are not fully understood.

The siting of turbines within a recognised migratory corridor adds another significant risk, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

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

Overall, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted puts the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately contributing to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal presented fails to adequately assess cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape that intricately links environment, language, tradition, and community. The assessment adopts an overly simplistic view, treating heritage as a collection of separate, static assets instead of recognising their continuing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are addressed. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use and meaning, as well as the potential

impacts of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural implications and disregards the sites' importance in community life.

The intangible aspects of cultural heritage are also not considered, with the assessment omitting critical elements like the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These factors are vital to the area's identity, yet their exclusion signifies a major oversight. Without addressing these elements, the cultural impact of the development remains inadequately assessed.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of genuine engagement calls into question the credibility of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

Furthermore, a significant procedural error arises from the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without such an assessment, the relevant authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This oversight alone renders a lawful determination impossible.

From a policy standpoint, the deficiencies in the application are at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear breach of policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and essential statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, and the application does not provide a solid foundation for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines close to the West Lewis coastline threatens to fundamentally alter the character of this sensitive environment. This area is characterised by its open Atlantic horizon, undeveloped landscape, and strong sense of remoteness. The introduction of such industrial structures would create a continuous and dominant presence along the shoreline, leading to a permanent and irreversible transformation of the landscape.

The assessment provided does not sufficiently reflect the magnitude of the visual changes anticipated. Given the scale and proximity of the turbines, they would

overshadow views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the region. The assessment fails to convey the true level of impact and its significance, given the sensitivity of the landscape involved.

Moreover, there are notable methodological shortcomings in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the potential visual impact has been underestimated, which undermines the reliability of the overall assessment.

Another critical gap is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their surroundings, with visual and spatial relationships tied to the Atlantic horizon. Treating these sites as isolated entities fails to acknowledge their interdependence, leading to an incomplete assessment of the impacts on their setting and cultural significance.

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

From a policy standpoint, this proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The anticipated scale of change contradicts the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case assessment further undermines any claims of compliance with policy.

The detrimental impacts identified cannot be adequately mitigated. The scale, height, and proximity of the turbines ensure their presence would be both dominant and unavoidable. Consequently, the change is fundamental and permanent, resistant to reduction through mitigation measures.

In conclusion, the assessment does not accurately represent the extent of the impact, the sensitivity of the environment, or the interconnectedness of the landscape and heritage. These inadequacies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, both of which are inadequately addressed in the application. The assessment of fisheries and marine life fails to provide a comprehensive evaluation of the ecological and socio-economic impacts associated with the proposal. It does not sufficiently demonstrate that these vital uses and habitats can be safeguarded from

significant disruption.

A crucial flaw lies in the assumption that fishing activities can be displaced without any adverse consequences. The lack of evidence supporting the availability or accessibility of alternative fishing grounds capable of accommodating additional pressure is a serious oversight. This gap in the assessment is particularly concerning, as displacing fishing activity risks overfishing in other areas, potentially leading to broader economic ramifications for the local fleet. Without a detailed and evidence-based analysis, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, primarily due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is likely to create disturbances over considerable distances, impacting species such as dolphins. The application underestimates the predicted disturbances affecting a significant portion of the local bottlenose dolphin population, which raises alarming concerns, particularly as it lacks sufficient supporting evidence to justify this downplaying of potential impacts.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is recognised, yet the impacts are simultaneously characterised as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in light of anticipated harm that may require legal authorisation.

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

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any assertion that the proposal aligns with sustainable development principles.

In summary, the deficiencies highlighted, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions, lead to an incomplete and unreliable assessment. These shortcomings preclude a thorough evaluation of impacts on marine life and fisheries.

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 assessment of tourism impacts is notably inadequate, lacking a thorough evaluation of the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified

analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the total economic contribution.

Significant growth in tourism has been observed, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this crucial analysis, it remains unclear whether the development would yield a net economic benefit or adversely affect a well-established and expanding sector.

Furthermore, the assessment does not acknowledge the critical role that environmental quality plays in tourism, such as the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community that experiences limited economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and the sustainability of the community. The absence of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed as stipulated by the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity of proving net benefit. Additionally, it contradicts strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the lack of quantification of tourism impacts, failure to evaluate environmental factors influencing visitor behaviour, and disregard for the economic dependency of the island culminate in a significant evidential gap. This hinders a comprehensive assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors 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 latest application is now presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided by the application is neither complete nor reliable. There

are notable deficiencies in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Additionally, the application overlooks crucial impact pathways, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of potential significant effects and residual impacts.

Furthermore, there are distinct procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. The omission of a comprehensive Social Impact Assessment further compounds these issues, obstructing the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience. These inadequacies are enough to deem the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, which obscures understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant as well. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

Additionally, the proposal would 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 entail permanent effects that cannot be mitigated to an acceptable level.

In light of these numerous and serious concerns, the application is both procedurally and substantively unfit for determination. The scale of information gaps, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory measures to compel the submission of the missing information.

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

Additional Comments

These giant turbines will impact the beauty of the Island, & seabirds. This is a beautiful island which can do without these destroying the landscape.

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: 51F2513E

Member of the public 1556

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural implications, and procedural compliance. The site of the proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and distinct cultural identity. Concerns arise regarding the compatibility of the proposal with statutory obligations, national policies, and the overarching principles of sustainable development, particularly considering its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several critical elements of the proposal remain undefined. The flexible design framework employed obscures the potential significant effects, while the reliance on unspecified mitigation measures raises questions about their efficacy. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by credible evidence.

Moreover, there are evident and significant conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and public health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and inhibit the competent authority from reaching a conclusion that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal raises additional concerns due to the large turbines being positioned in close proximity to the shoreline, leading to significant issues regarding landscape capacity, visual impact, and overall environmental consequences. Collectively, the lack of comprehensive information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely lacking, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. Rather than recognising heritage as a living, dynamic element, the application simplifies it into isolated, static assets. This flawed perspective neglects the ongoing social, cultural, and spiritual significance of these elements within the community.

Particularly alarming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely historical markers; they are active locations for burial and spiritual practices. The assessment reduces them to static features, ignoring their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity, yet they are entirely absent from the evaluation, representing a significant gap. Without addressing these factors, the true cultural impact of the development remains obscured.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, with recognised characteristics of Indigenous Peoples, yet the application does not include a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and contravenes established principles that call for participation in decisions affecting cultural and environmental matters.

A major procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone obstructs a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, coupled with a failure to recognise living cultural practices, constitutes a clear deviation from policy mandates.

Taken as a whole, the failure to assess living heritage, intangible cultural value, community rights, and statutory duties creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately examined, and the application does not provide a sufficient foundation for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing is fundamentally flawed and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the comprehensive report has not been made available. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks highlighted by the developer's own research.

Evidence suggests that local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement and are not conjectural. Nonetheless, the absence of the full assessment restricts proper scrutiny of these findings, thus impairing the capacity to assess their significance in the decision-making process.

Additionally, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The non-disclosure of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when there may be effects on community character and functionality. The failure to provide the complete dataset means the application does not offer a solid evidential foundation for evaluating the balance between benefits and detriments.

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

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a significant omission in the application, representing a failure to satisfy the evidential standards of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines close to the shoreline threatens to establish a continuous industrial presence that would irrevocably alter this landscape. The assessment provided does not adequately capture the significant visual changes that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and detract from the essential qualities of naturalness and remoteness, while the assessment falls short in conveying the magnitude and significance of this impact on such a sensitive environment.

There are notable methodological flaws in how visual viewpoints have been selected and presented. Evidence points to the possibility that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, calling into question the reliability of the overall assessment.

Additionally, the evaluation fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever the existing relationships, fundamentally altering the context in which these heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not merely a visual impact but a more extensive cultural and spatial harm that has not been sufficiently evaluated 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 assets. The anticipated scale of change is incompatible with the essential need to protect landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further undermines any assertions of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the intricate relationship between landscape and

heritage. These shortcomings impede a reliable evaluation and strongly support the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide assurance that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This lack of compliance raises significant concerns about whether the proposal can be considered sustainable development.

The assessment of fisheries and marine life is inadequate, lacking a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the application does not show that these uses and habitats can be protected or maintained without significant disruption.

A key issue is the assumption that fishing activity can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This is crucial, as displacement could lead to overfishing in other areas and might have wider economic consequences for the local fleet. Without a clear assessment based on evidence, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, substantial risks to marine species are introduced, particularly due to underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over large distances, notably affecting dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application downplays these effects without adequate supporting evidence.

There is also a contradiction within the application, where the requirement for licences to harm European Protected Species is acknowledged while simultaneously stating that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to the extent that legal authorisation is necessary.

The assessment neglects to consider cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be determined.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking and does not consider the full range of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are fundamentally interconnected; however, they are being evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation close to Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically important habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or postponing 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 be assessed collectively, yet the disconnection of the offshore and onshore elements prevents a full understanding of the combined impacts on peatlands, habitats, and local communities.

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

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or procedures have been initiated, which raises concerns regarding the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known

for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that can be seen from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important due to the value of dark skies for the local identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts represents a clear gap in the overall assessment of the landscape and environment.

More importantly, there has been no evaluation of how nocturnal wildlife will be affected. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application fails to include any assessment of lighting impacts or a phototaxis study, and thus does not address how aviation lighting may affect these species or raise mortality rates.

This issue is exacerbated by the use of daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related 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 absence of specific night-time data creates a significant gap in understanding the ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful decision.

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

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

TOURISM

The assessment of tourism impacts associated with the proposed development is severely inadequate and neglects to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscape, dark skies, and its sense of remoteness. Although the application recognises that 86% of visitors are attracted by the scenery, it

fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Since 2017, tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million to over £81.5 million, supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Despite this significant increase, the application does not model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the evaluation neglects to take into account the essential role of environmental quality in sustaining tourism, including the critical importance of unspoiled landscapes and dark skies to enhance visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a notable gap in understanding the impacts on a recognised and expanding part of the local economy.

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

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

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependencies results in a considerable evidential void. This deficiency hampers a comprehensive evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, presented under a supposedly stronger policy framework, has not adequately addressed the essential considerations of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical deficiencies exist in the evidential basis for the proposal. There are notable gaps in baseline data, a reliance on an undefined design envelope, unspecified mitigation measures, and significant omissions in key impact pathways related to nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, preventing a comprehensive understanding of potential significant effects or residual impacts.

Additionally, the application exhibits procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment is a serious omission. These inadequacies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Conflicts with National Planning Framework 4 are evident. The proposal fails to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, and does not satisfactorily address health and wellbeing impacts or provide evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals lack completeness and are inconsistent in parts. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy contradictions, and unresolved environmental risks obstructs a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or utilise the appropriate regulatory measures to compel the submission of the necessary missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 078F52B0

Member of the public 1557

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its supporting documents has revealed significant deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its stunning Atlantic-facing coastline, near-pristine surroundings, and rich cultural heritage. The design, scale, and proximity of the wind farm raise profound questions about its alignment with statutory obligations, national policy, and the principles governing sustainable development.

Fundamentally, the application lacks a sufficient evidential foundation for a lawful decision. Key environmental data is notably absent, and the baseline information provided is limited and inconsistent. Moreover, crucial elements of the proposal remain undefined. The flexible design framework employed hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents a proper evaluation of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community implications, leaving claims of negligible or non-significant effects unsupported by solid evidence.

There are evident and serious conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and public health and wellbeing. It does not prove that it can meet national obligations to safeguard biodiversity, address climate issues, and maintain environmental integrity. These discrepancies directly challenge the statutory requirements for consent and weaken the authority's capacity to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal raises additional concerns, particularly with the large turbines being sited in close proximity to the shoreline. This introduces significant worries about landscape capacity, visual impact, and broader environmental ramifications. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and unable to support a lawful decision. In light of these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental repercussions of the proposal. The employment of a flexible Project Design Envelope, lacking definitive commitments to specific turbine dimensions, layouts, or configurations, introduces a substantial level of uncertainty. This approach obstructs a consistent application of a worst-case scenario, thereby jeopardising the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that is ultimately constructed, which prevents both the public and the competent authority from grasping the true scale of environmental effects.

Significant reliance is placed on mitigation measures, monitoring strategies, and management plans that remain undefined. The request for consent is thus made on the premise that environmental damage will be addressed at a later stage, which hinders any meaningful evaluation of the effectiveness of such measures or a thorough assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are numerous evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty surrounding the scale and significance of impacts, particularly where findings 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 and introduces a level of scientific uncertainty that cannot be aligned 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 fails to demonstrate adherence to National Planning Framework 4, specifically the requirements pertaining to biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that adequate safeguards are in place.

In summary, the dependence on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment in the application fundamentally fails to meet the statutory requirements imposed by the Environmental Impact Assessment

regime. Instead of delivering a structured and reasoned comparison of viable alternatives predicated on their environmental impacts, the application merely recounts the evolution of the project. This narrative approach does not substantiate that less harmful options have been appropriately identified, evaluated, and preferred over more damaging ones.

The analysis lacks transparency and does not provide an evidence-based comparison regarding alternative offshore sites, development scales, or design configurations. Notably, the applicant has not convincingly demonstrated that the possibility of positioning turbines further offshore has been rigorously considered, despite the expectation that such a location could significantly lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline highlights the crucial role of proximity to shore in determining potential impacts; thus, the absence of thorough analysis in this regard precludes any conclusion that the proposed siting is the least damaging option available.

The shortcomings extend to the assessments regarding cable routing and landfall, where there is inadequate evidence that alternative pathways have been comprehensively examined to mitigate impacts on sensitive receptors. Areas of cultural and spiritual significance, such as Barvas Cemetery, are inadequately protected due to the lack of a clear avoidance strategy and comparative analysis. This failure indicates that the principle of mitigation by design has not been implemented, with an over-reliance on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful selection of the site, layout, and routing of infrastructure. This represents a notable deviation from the established mitigation hierarchy and hampers the ability of the competent authority to ascertain the existence of less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it cannot be asserted that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency significantly undermines alignment with National Planning Framework 4, especially concerning the safeguarding of natural landscapes, cultural heritage, and the wellbeing of communities. The absence of a structured and comparative assessment constitutes a material shortcoming that leads to the overall conclusion that the application has not been sufficiently evaluated and fails to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, failing to deliver a comprehensive and trustworthy understanding of ecological receptors within the West Lewis coastal environment. This marine system is particularly sensitive and biologically active, yet the baseline data remains incomplete. The methodologies employed do not sufficiently capture essential aspects such as species presence, behaviour, and habitat use. Consequently, the assessment does not establish a solid

evidential foundation for evaluating potential impacts.

One critical gap is the assessment related to otters, which are classified as a European Protected Species. The application does not adequately recognise or evaluate their active utilisation of coastal areas for foraging and movement. The oversight concerning their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This deficiency undermines any conclusions drawn regarding the absence of significant effects on otters.

Additional shortcomings are evident in the evaluation of basking sharks. The dependence on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider relevant data results in an incomplete baseline, further compromising the reliability of the conclusions presented.

These methodological weaknesses culminate in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

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 waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns about carbon balance. The disturbance of peatland can lead to the release of stored carbon, resulting in a carbon debt that is contrary to the goals of renewable energy development. The application fails to sufficiently address this matter or demonstrate that the overall carbon balance will remain positive.

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

There are substantial risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not show that impacts on these habitats have been fully assessed or that suitable

avoidance measures have been taken. This reveals a significant evidential gap in terms of biodiversity protection.

The assessment of onshore infrastructure is materially incomplete and does not account for the full range of impacts associated with what is fundamentally a single integrated project. The onshore works and offshore turbines are intrinsically linked yet assessed separately, leading to a fragmented approach that conceals the true scale of environmental and socio-economic effects.

The onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These works entail excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it does not include an evaluation of dark skies and nocturnal wildlife. The West Lewis coastline is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal would introduce permanent red aviation lighting that would be visible over considerable distances, creating a continuous and intrusive "wall of light" effect on the western horizon, thereby fundamentally altering the night-time environment.

Furthermore, the application fails to consider the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the region's identity and the emerging tourism sector, including astro-tourism. As a result, there is a substantial

gap in the landscape and environmental assessment.

Equally important is the lack of evaluation concerning nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not incorporate any assessment of lighting impact or conduct a phototaxis study to examine the potential effects of aviation lighting on these species and the associated mortality risks.

The situation is exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or related risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, a threat that has not been evaluated. The absence of site-specific night-time data represents a critical gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding 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 a vital aspect of the ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in terms of sustainable development, failing to meet statutory duties, national policy, and evidential standards. The issues presented echo those that led to the rejection of the Lewis Wind Power proposal in 2008, as the scale of industrialisation was deemed unacceptable. This current application is made under a more stringent policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for the application, with the use of an undefined design envelope, unspecified mitigation measures, and the omission of significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. This renders the Environmental Impact Assessment incomplete, hindering a full understanding of potential significant effects and residual impacts.

In terms of procedural integrity, the lack of a compliant Island Communities Impact Assessment breaches the statutory duty established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contravenes National Planning Framework 4, as it does not sufficiently protect biodiversity, natural habitats, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of net economic benefits due to the absence of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are notable, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Moreover, the proposal is set to cause significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, alongside adverse impacts on tourism, all represent permanent changes that cannot be sufficiently mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with conflicts with established policy and unresolved environmental risks, obstructs any lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or enforces regulatory provisions to compel the submission of the outstanding information. Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Additional Comments

Whitest I personally am unhappy about spoiling the view, this is not my objection as I understand green and sustainable energy is necessary.

However I am concerned that all statements about the impact on marine and island ecology is being avoided. Impact studies could and should have been made accessible but all feels to be very difficult to access.

Once permission is given what is to prevent the construction becoming cheapest possible. After all their obligation is to shareholders to make as much money as possible. I fo not feel there are mitigating obligations to take care of our very rich marine and moorland ecosystems.

Why is this not a floating wind farm? I still don’t know the long term effects in the marine (other than small life ecosystems builff D ing on the structures.)

What will happen to the change of currents around the wind farm? Will this affect the ecosystem in the sea or cause impact and errors ion on the island coast?

How can we not object when all o this is still unclear?

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: A2B461E7

Member of the public 1558

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under marine licensing and Environmental Impact Assessment rules. The proposal is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful decision. There is a notable absence of critical environmental data, while baseline information is limited and inconsistent. Many key aspects of the proposal remain undefined, and the use of a flexible design framework obscures an understanding of potential significant effects. Furthermore, relying on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects lacking robust support.

There are significant conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that the national requirements to safeguard biodiversity and environmental integrity will be fulfilled. These discrepancies directly relate to the statutory requirements for consent and impair the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact due to the large turbines being situated close to the shoreline. Overall, the lack of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been published, leading to a significant evidential gap that obstructs both public understanding and the competent authority's evaluation of the social risks identified by the developer's own

research. Available summaries reveal that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative. Nonetheless, the lack of full disclosure limits proper scrutiny of the findings and hinders the assessment of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” highlighted within the developer’s findings. Despite this, these impacts have not been adequately integrated into the main application or given the necessary weight. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning are at stake. By withholding the full dataset, the application does not provide a complete evidential basis to weigh the balance between benefits and harm.

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

The procedural implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries is fundamentally flawed and does not adequately evaluate the ecological and socio-economic implications of the proposal. The waters off the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry. However, the application fails to guarantee that these habitats and activities will be preserved or sustained without considerable disruption.

One critical flaw in the application is the assumption that fishing activities can be shifted without negative repercussions. There is no evidence provided that alternative fishing grounds are both available and capable of sustaining the increased pressure. This gap is critical, as displacing fishing efforts risks overfishing in other areas,

potentially leading to wider economic repercussions for the local fishing community. Without a thorough and evidence-based assessment, the impacts on both fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant threats to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over considerable distances, negatively impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is deeply concerning; yet, the application minimizes these impacts without providing adequate supporting evidence.

In addition, the application reveals a troubling inconsistency: while it acknowledges the necessity of licenses to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction casts doubt on the validity of the assessment and raises important questions about adherence to the Habitats Regulations, especially given the anticipated harm that may require legal authorisation.

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

From a policy standpoint, the application lacks evidence of compliance with National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the project constitutes 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 untrustworthy. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards required for sustainable development as set out in statutory duties, national policy, and evidential standards. It revisits the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are significant shortcomings in the evidential foundation necessary for a thorough evaluation. The data provided is incomplete, with notable gaps, including reliance on an unspecified design envelope and unelaborated mitigation measures.

Additionally, there is a lack of consideration for vital impact pathways, such as nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate and does not facilitate a full understanding of the likely significant effects or residual impacts.

Procedural issues are also evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the full Social Impact Assessment constitutes a material omission. These failures hinder the ability of the competent authority to assess implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural sites, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The assessment of cumulative impacts from offshore and onshore activities has not been sufficiently conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Additionally, the project is set to cause significant and irreversible changes to a highly sensitive landscape. The industrial development along the Atlantic-facing coastline, loss of dark skies, disruption to cultural and visual connections, and negative impacts on tourism will result in permanent effects that cannot be adequately mitigated.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AAB81EAF

Member of the public 1559

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The basis of this objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised about the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks a sufficient evidential foundation necessary for a lawful determination. Essential environmental data is absent, and the baseline information presented is both limited and inconsistent, with critical components of the proposal remaining undefined. The flexible design framework employed hinders a clear assessment of significant effects, while the reliance on unspecified mitigation measures prevents any evaluation 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 robust evidence.

There exist significant policy conflicts, as the proposal seems 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. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and weaken the capacity of the competent authority to determine that the development meets policy acceptance.

Moreover, the magnitude of the proposal is unprecedented in this area, with large turbines positioned perilously close to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unfit for a lawful determination. Under these conditions, it is imperative that the precautionary principle is invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The application lacks a thorough assessment of marine ecology and protected species, which is crucial for understanding the ecological receptors in the West Lewis coastal area. This region is known for its sensitivity and biological activity, yet the baseline data remains incomplete. The methods used have not effectively captured important details about species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis to evaluate the potential impacts.

One significant oversight is the failure to appropriately acknowledge the presence of otters, which are protected under European law. The application does not adequately assess their use of coastal areas for foraging and movement. There is insufficient consideration of their core foraging range and behavioural patterns, leading to an inadequate assessment of potential impacts from construction disturbance, noise, and increased activity. This lack of information undermines any claims of no significant effects on otters.

Additionally, the assessment of basking sharks shows shortcomings, as the reliance on aerial surveys creates a significant detection bias, particularly under Atlantic weather conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. Ignoring or inadequately considering this 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 stem from assumptions rather than strong evidence. Without sufficient baseline data, it becomes impossible to assess cumulative and indirect impacts meaningfully, including seasonal variations and broader ecosystem interactions. This situation leads to uncertainty regarding the actual risk faced by 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, since it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the precautionary principle. Given these issues, consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and contribute to the conclusion that the application lacks a solid evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing associated with the proposal have not been adequately assessed, resulting in a significant lack of transparency essential for a lawful evaluation. The developer has conducted a Social Impact Assessment, which included focus groups with local residents; however, the absence of the full report creates an evidential gap that hinders both public understanding and the competent

authority's ability to assess the social risks highlighted in the developer's own research.

Residents have already reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, with these impacts grounded in direct engagement rather than speculation. Nonetheless, the failure to release the complete assessment limits scrutiny of the findings and impedes the determination of their significance in the decision-making process.

Furthermore, the proposal is viewed by some as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite the identification of these impacts, they have not been adequately incorporated into the main application or given the necessary weight. The decision to withhold the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community are at stake. By not providing the complete dataset, the application does not furnish a comprehensive evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application fails to comply with the National Planning Framework 4 concerning health and wellbeing, which mandates that development should foster positive health outcomes and avoid harm. The evidence available suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

The procedural ramifications are significant, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material shortcoming within the application and violates the evidential standards set forth in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of pre-existing adverse impacts, results in an incomplete and unreliable assessment. This undermines the potential for a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by an open Atlantic horizon and a strong sense of remoteness. This area is noted for its undeveloped character, and the presence of such turbines would create a continuous industrial presence that would fundamentally alter the landscape, resulting in a permanent and irreversible transformation. The application fails to adequately represent the magnitude of the visual change that would

occur. Due to their scale and proximity to the shoreline, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. It appears that these viewpoints do not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This methodological flaw raises the risk that the magnitude of the visual impact has been understated, which undermines the reliability of the overall assessment.

Additionally, there is a significant deficiency in the assessment's consideration of the interconnected relationship between landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This change represents not just a visual impact but a broader cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, which protects natural places and historic assets. The scale of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any assertion of compliance with policy.

Finally, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making the resulting change fundamental and permanent rather than reducible to an acceptable level through mitigation efforts. In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This results in an incomplete assessment of construction and pollution risks, hindering any meaningful evaluation of likely environmental effects. Instead, the application depends on undefined future mitigation and contingency measures, which raises concerns about

their adequacy and effectiveness in such a sensitive environment.

The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not provide sufficient detail on prevention, control, or monitoring measures. Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes that could arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological effects of these impacts, including potential consequences for sensitive marine species and habitats identified in the wider assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to evaluate whether appropriate safeguards are in place to handle pollution events. This introduces procedural risks and conflicts with the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be assessed prior to consent. The application also fails to demonstrate compliance with environmental protection and water quality policy requirements. Collectively, these deficiencies highlight that the absence of defined mitigation measures and the lack of detailed management plans render the assessment materially inadequate, preventing a robust evaluation of construction and pollution risks.

FISHERIES AND MARINE LIFE

The assessment of the proposed development raises significant concerns regarding its impact on both fisheries and marine life. The waters off the West Lewis coast are not only home to a diverse marine ecosystem but also support an active fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from substantial disruption.

A critical flaw within the application is the unsubstantiated assumption that fishing activities can simply be relocated without adverse consequences. There is no evidence provided to suggest that alternative fishing grounds are available or capable of accommodating the additional pressures that displacement would create. This oversight is particularly troubling, as it could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended period is expected to cause widespread disturbance, which may affect species such as dolphins. Alarmingly, the potential disruption to a significant portion of the local bottlenose dolphin population is

downplayed in the application, lacking adequate supporting evidence.

There exists a noteworthy inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction calls into question the credibility of the assessment and raises alarms about compliance with the Habitats Regulations, particularly in situations where anticipated harm necessitates legal authorisation.

Moreover, the cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities, have not been adequately considered. 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 comply with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal constitutes sustainable development.

In summary, the insufficient evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment collectively render it incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with this project include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. These activities will require excavation in areas of deep peat, especially within Barvas Moor, which is both a vital carbon store and an ecologically sensitive area. The failure to provide a thorough assessment of these impacts prevents a clear understanding of the overall environmental footprint of the project.

The assessment of onshore infrastructure is materially incomplete and does not consider the full extent of impacts from what is a single integrated project. The offshore turbines and onshore components are interconnected; however, they are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects, as excluding or deferring the assessment of onshore impacts hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed together, yet the separation of onshore and offshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

There are serious risks to sensitive habitats, including machair systems and peatland

environments that are protected under policy. The application does not convincingly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a significant evidential gap concerning biodiversity protection.

Moreover, the routing of 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 casts doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the inability to assess the project as a whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The lack of evidence to demonstrate that impacts can be avoided or mitigated further undermines 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 part of the application incomplete and unreliable, ultimately obstructing a lawful determination. The proposal also raises concerns about carbon balance, as disturbance of peatland results in the release of stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

TOURISM

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social consequences for a vital part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a detailed evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island’s economy. Nevertheless, the application fails to consider how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to determine if the proposed development would yield a net economic benefit or detrimentally impact an established and expanding sector.

Moreover, the assessment does not address the critical role of environmental quality in sustaining tourism, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a substantial gap in understanding the implications for a recognised and burgeoning

segment of the local economy.

In a community with limited economic diversity, neglecting the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a thorough Island Communities Impact Assessment means these economic vulnerabilities have not been examined as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, especially concerning economic impact 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 ramifications of the proposal.

Overall, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and consider the island's economic dependencies results in a significant evidential void. This inhibits a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

There are considerable deficiencies in the evidential basis required for determination. The application is marred by critical gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address significant impact pathways, particularly concerning nocturnal wildlife, the entirety of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or any residual impacts.

Procedural failures are also evident in the application. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The impacts on health and wellbeing are not shown to be

acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from offshore and onshore elements has not been adequately conducted, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain both uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The required evidential threshold to confirm that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I would like to note my objection to the proposed wind farm development off the coast of the Isle of Lewis.

These are unnecessary from a security of electricity supply, will be an expensive and ultimately destructive addition to the Isle of Lewis. From marine protection, visual eyesore and the disruption to island life from extended construction and O&M requirements to the impact of hundreds of workers on infrastructure and transport the damage will be significant, longstanding and irreversible should this go ahead.

I strongly object to this project.

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: 2CBB4E95

Member of the public 1560

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 fundamentally inadequate and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the assessment's integrity, making it difficult for both the public and the competent authority to grasp the true extent of environmental impacts.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is being requested with the expectation that environmental harm will be managed at a later stage. This approach hinders a meaningful evaluation of the measures' effectiveness and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and the use of assumptions rather than site-specific evidence. These issues create uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations, failing 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, especially regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that proper safeguards are in place.

In summary, the dependence 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 hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or assess protected species. The degree of uncertainty introduced obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is impossible to lawfully grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its compliance with established evidential standards, particularly in relation to the integrity of protected sites. The ornithological assessment reveals internal inconsistencies and substantial gaps in evidence that critically undermine its conclusions. Despite the west coast of the Isle of Lewis hosting internationally important seabird populations, which are already

experiencing declines, the application fails to adequately demonstrate that these species will not face adverse impacts. It is particularly troubling that the development is situated within vital foraging areas and migratory pathways, yet the assessment does not thoroughly evaluate the potential risks associated with displacement, collision, or habitat loss.

A serious contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously making a case for Habitats Regulations derogation—a process only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions presented lack robust support from the evidence provided. Furthermore, there is insufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment neglects to fully account for the importance 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 appear likely to underestimate mortality rates, especially in instances where baseline data is lacking and species behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor poses an additional risk, potentially creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality within this corridor or its potential effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This activates the precautionary principle, thereby hindering a lawful conclusion in favour of consent.

Additionally, the deficiencies noted signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not suffer adverse effects positions the proposal in direct contradiction to national policy.

Overall, the unreliability of the assessment stems from its internal contradictions, methodological shortcomings, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally inadequate. It does not recognise the West

Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. The application adopts a reductive approach, viewing heritage merely 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 locations are active places of burial and spiritual practice; however, they are categorised as static features in the assessment. This failure to consider their continued use and meaning, as well as the implications of development on their settings, results in an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Moreover, the application neglects to assess intangible cultural heritage, including the Gaelic language and local traditions. The long-standing relationship between the community and the coastal environment is central to the area's identity, yet these elements are entirely absent from the assessment, representing a significant omission. As such, the cultural impact of the development cannot be fully understood without considering these crucial factors.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, which aligns with characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the legitimacy of the assessment and fails to adhere to 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, as required under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders a lawful determination of the proposal.

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear departure from policy requirements.

In summary, the collective failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment has raised significant concerns, as it lacks the necessary transparency for a lawful evaluation. While the developer engaged with

local residents through focus groups, the full report has not been published. This gap in available information hinders both the public and the competent authority from grasping the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing tangible stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are not merely speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of the findings, limiting the ability to assess their significance in the decision-making process.

Moreover, there is a prevailing perception that the proposal threatens community identity and cohesion, with "cultural loss" identified within the developer's findings. Nonetheless, these impacts have not been adequately integrated into the main application or given the necessary attention. The lack of a full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The absence of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application lacks a robust evidential basis to assess the balance between benefits and harms.

From a policy perspective, there is a failure to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and avoid harm, yet available evidence suggests adverse effects that remain undisclosed. Without the complete assessment, the application cannot prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material deficiency in the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This compromises the capacity for a lawful determination and reinforces the view that the application is not backed by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts associated with the proposed development is significantly lacking and does not sufficiently convey the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis, characterised by its open Atlantic horizon and undeveloped nature, embodies a strong sense of remoteness. The introduction of large-scale turbines in

close proximity to the shoreline would result in a pervasive industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately depict the scale of this visual change. Due to their size and proximity, the turbines would dominate the views from residential areas, historic sites, and frequently visited coastal locations. This would have a direct impact on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts in the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints selected may not adequately 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 magnitude of visual impact has been understated, compromising the assessment's reliability.

A further shortcoming is the failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated elements, overlooking their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and their connection 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 contradicts the National Planning Framework 4 regarding the protection of natural places and historic assets. The proposed scale of change is inconsistent with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

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

FISHERIES AND MARINE LIFE

The application lacks a comprehensive 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 vibrant marine ecosystem and a thriving fishing industry, yet there is no evidence in the application demonstrating that these habitats and activities can be protected or maintained without significant disruption.

A major concern lies in the assumption that fishing activities can be displaced without repercussions. The application does not offer proof that alternative fishing grounds exist, are accessible, or can handle additional pressure. This significant omission raises the risk of overfishing in other areas and poses potential economic challenges for the local fleet. The inability to deliver a clear and evidence-based assessment means that the effects on fisheries and livelihoods remain unclear.

Moreover, substantial risks to marine species are introduced, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over an extended timeframe is expected to cause disturbances across considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There is a notable inconsistency in the application that acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

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

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

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

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the principles of sustainable development as outlined by statutory duties and national policy. This application mirrors the key concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being put forward under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for this application is notably absent. There are serious deficiencies in baseline data, the use of an undefined design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways. These include nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a full understanding of potential significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to share the 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 unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The overall assessment of cumulative impacts from both offshore and onshore elements is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The requisite evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposed development would lead to considerable 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 connections, and the adverse effects on tourism constitute permanent impacts that cannot be mitigated to an acceptable degree.

In light of these factors, the application is fundamentally and procedurally unsuitable for determination. The vast information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should therefore refuse consent on these bases or invoke relevant

regulatory provisions to necessitate 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: F7E32545

Member of the public 1561

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the relevant marine licensing and Environmental Impact Assessment frameworks. It highlights significant deficiencies across planning, environmental, cultural, and procedural dimensions. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal emerge due to its potential incompatibility with statutory requirements, national policy, and sustainable development principles.

A critical issue lies in the application's inadequate evidential basis for a lawful determination. There is a notable absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The proposal's flexible design framework hinders a clear assessment of likely significant effects. Reliance on unspecified mitigation measures precludes an evaluation of their potential effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Moreover, there are evident and substantial conflicts with established policies. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate adherence to national obligations aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's policy acceptability.

The unprecedented scale of the proposal raises further alarm, with large turbines positioned uncomfortably close to the shoreline, which introduces serious concerns related to landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, dependence on undefined mitigation, evidential shortcomings, and clear policy discrepancies illustrate that the application is incomplete and incapable of facilitating a lawful determination. In light of these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the probable environmental repercussions of the proposal. By employing a flexible Project Design Envelope without any firm commitment to particular turbine dimensions, layouts, or configurations, significant uncertainty is introduced. This ambiguity undermines the integrity of the assessment and means that the impacts outlined may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is being sought on the premise that environmental harm will be addressed after approval, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be thoroughly established before determination.

Moreover, there exist significant evidential deficiencies, such as gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with 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 situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that appropriate safeguards are in place.

In 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 thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination regarding the application.

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 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 west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application does not convincingly demonstrate that these species will not be adversely affected, failing to robustly evaluate the implications of displacement, collision risk, or habitat loss, particularly in relation to key foraging areas and migratory pathways.

There is a fundamental contradiction present within the application itself. While the developer concludes that there will be no significant adverse effects, they

simultaneously advance a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the underlying evidence.

Moreover, the assessment does not provide sufficient evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces uncertainty, especially for species that are in severe decline, including Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not comprehensively understood.

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

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

The identified deficiencies also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to 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 inconsistency, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of the impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in relation to the proposed development is fundamentally flawed, as it overlooks the West Lewis coastline's significance as a dynamic cultural landscape. This landscape is characterised by an intricate connection between the environment, language, tradition, and the community itself. Unfortunately, the application simplifies heritage into isolated, static entities, neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which are vital places for burial and

spiritual practice. The assessment reduces these active sites to mere static features, ignoring their continued use and the implications of development on their surroundings. This failure leads to an inadequate evaluation of cultural impacts and disregards their importance to community life.

Moreover, the assessment neglects to consider intangible cultural heritage, such as the Gaelic language and traditions, along with the deep-rooted relationship between the community and the coastal environment. These elements are vital to the area's identity yet are completely omitted from the evaluation, representing a substantial oversight. Without acknowledging these factors, the true cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the necessary process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to recognised principles of participation in decisions that affect cultural and environmental interests.

A serious procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the relevant authority cannot adequately fulfil its legal obligations to consider the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these oversights put the proposal at odds with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, represents a significant deviation from policy standards.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory requirements create a substantial evidential gap. The cultural ramifications of the development have not been appropriately examined, and the application lacks a solid foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application presents a materially deficient assessment of social impacts, health, and wellbeing, lacking the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the full report has not been released. This represents a significant evidential gap that hinders both public understanding and the competent authority's capacity to grasp the full extent of social risks highlighted by the developer's research.

Evidence suggests that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, which stems from direct engagement rather than speculative assertions. Nevertheless, without disclosure of the complete assessment, proper scrutiny of these findings is obstructed, limiting the evaluation of their significance in the decision-making process.

Moreover, there is a prevailing perception that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” identified as a concern in the developer’s own findings. Despite this acknowledgment, the impacts have not been adequately integrated into the main application nor given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency poses challenges to the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly those that may affect community character and functioning. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is imperative that development supports positive health outcomes and mitigates harm. The existing evidence indicates adverse effects that remain undisclosed, thereby hindering the demonstration of compliance with relevant policy.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material failure within the application, failing to meet the evidential standards required by the Environmental Impact Assessment framework.

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 deficiency impedes a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would fundamentally change this character, creating a continuous and dominant industrial presence that would lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to reflect the scale of change or the sensitivity of the receiving environment.

The application does not adequately convey the magnitude of the visual change. The

turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. Methodological concerns arise regarding the selection and presentation of visual viewpoints, which 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 possibility that the visual impact has been understated, diminishing the assessment's reliability.

Another significant oversight is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently assessed. 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 setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation. Collectively, these deficiencies in the assessment fail to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current proposal is deficient in its assessment of construction and pollution risks, lacking the necessary detail to adequately evaluate the likely environmental effects. Notably, the application involves significant 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, it relies on mitigation and contingency measures that are to be formulated post-consent, thereby hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on undefined measures for future implementation is particularly troubling due to the sensitivity of the surrounding environment. The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. Although the application recognises

risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail regarding the preventative, control, or monitoring measures that would be employed.

Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. The absence of robust modelling and clearly articulated management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also applies to the possible effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing the establishment of contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to respond to any pollution incidents. This introduces procedural risks and compromises 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 stipulations of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation measures be evaluated prior to granting consent, and the absence of such information impedes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential environmental impacts renders the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks and strongly suggest that the application remains 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 application lacks a complete assessment of onshore infrastructure, which fails to consider the overall impacts of what is a single integrated project. The offshore turbines are intrinsically linked to the onshore works, yet these elements are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The current application does not provide a thorough assessment of these impacts, limiting a full understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project are considered collectively, but the division of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately addressed.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, highlighting a gap in the evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbing peatland can release stored carbon, leading to a carbon debt that contradicts renewable energy goals. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism value. The 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. This change would fundamentally alter the night-time environment.

The Environmental Impact Assessment fails to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. The significance of dark skies to the region's identity and to emerging tourism sectors, such as astro-tourism, makes this omission particularly troubling. The gap in the overall assessment of the landscape and environment is clear.

Moreover, there is no analysis of how the lighting will affect nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide a lighting impact assessment or a phototaxis study, meaning it neglects to consider how aviation lighting could impact these species or lead to higher mortality rates.

The assessment further relies on daytime survey data, which fails to capture nocturnal activity or associated risks. Kittiwakes, which might forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, there is a critical lack of understanding regarding ecological impacts.

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

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

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

TOURISM

The assessment of tourism impacts within the application is inadequate and does not address the economic and social repercussions for a vital sector of the Isle of Lewis economy. The region's tourism relies heavily on its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenic beauty; however, the application fails to provide a quantified analysis regarding how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not explore how the anticipated industrialisation of the seascape and the potential degradation of environmental quality might affect the Tourism Gross Value Added or the broader economic resilience. In the absence of this critical analysis, it remains unclear whether the development would yield a net economic benefit or pose a threat to a sector that is both established and expanding.

Furthermore, the assessment neglects to recognise the crucial role that environmental quality plays in attracting tourists, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the implications for a recognized and growing segment of the local economy.

Given the context of an island community that suffers from limited economic diversification, the lack of an assessment on tourism impacts has broader consequences 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 evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity of demonstrating net benefit. It contradicts strategic objectives that highlight tourism as a key growth sector, while also lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This lack of comprehensive evaluation hinders a robust understanding of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal constitutes a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite now being evaluated under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains fundamentally flawed.

A reliable evidential basis for determination is lacking, with critical gaps in baseline data and an undefined design envelope. The reliance on unspecified mitigation measures and the omission of key impact pathways, such as effects on nocturnal wildlife, complete onshore infrastructure, and tourism, indicate that the Environmental Impact Assessment is incomplete. This insufficiency prevents a comprehensive understanding of potential significant effects or residual impacts.

Procedural failures are evident, including the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment

represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct contradiction to the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, nor does it show that the impacts on health and wellbeing are acceptable. Furthermore, the absence of tourism impact modelling precludes evidence of a net economic benefit. The assessment of cumulative impacts involving both offshore and onshore components has not been sufficiently conducted, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty remains around environmental risks, particularly concerning marine ecology, seabirds, protected species, and marine mammals. Incomplete and internally inconsistent assessments have failed to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, making it impossible to lawfully conclude that impacts are acceptable.

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

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

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

Additional Comments

The construction of the wind farms will be an irrevocable and permanent blot on our landscape.
Once again this feels like exploitation by large and greedy multinational companies
The beauty and historic significance of our environment will be irreversibly eroded.
There is little benefit for those who live here..
The impact on tourism and thus the economy will be so detrimental.
There appears to be no benefits regarding fuel pricing in our climate and the real issues regarding fuel poverty within our communities
The community grant offered is a drop in the ocean in comparison to how our lives will be affected and will have little significance when shared out to local causes.
There appears to be little planning regarding the impact of supplies I. e food and ferry transport which will affect everyone including the proposed workforce.

The way of life in my village on the westside will be totally disrupted and spoiled.
There seems to be no regard for the preservation of our communities in comparison to the considerations in other areas of the country.
I ask what level of assessment have alternatives been considered.Ie Moving further from the shore or isolated parts of the moor would have much less impact on vital aspects relating to the preservation of island llving.
I have raised these concerns throughout the consultations and sincerely hope these matters will be taken seriously.

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: B9D26BB5

Member of the public 1562

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

Dear Sir/Madam

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

Fundamentally, the application lacks a sufficient evidential basis to support a lawful determination. There are critical gaps in environmental data, with baseline information proving limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not backed by adequate evidence.

The proposal presents clear and substantial conflicts with policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These policy conflicts directly affect the statutory tests required for consent and weaken the ability of the competent authority to determine that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal in this location, with large turbines placed in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to provide a clear and trustworthy account of the potential environmental effects of the proposal. The approach of using a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This lack of specificity undermines the assessment's reliability and means the impacts described may not accurately represent the final development, limiting the ability of the public and the competent authority to grasp the true environmental effects.

The application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions means that environmental harm will be addressed later, which hinders any genuine evaluation of effectiveness or assessment of remaining impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies should be clearly outlined before determination.

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

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

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and robust assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to adhere to the requirements of the Environmental Impact Assessment regime. Rather than offering a detailed and reasoned evaluation of viable alternatives based on their environmental impacts, it merely recounts the project's development history. This method does not adequately demonstrate that less damaging options have been properly identified or evaluated in favour of more harmful solutions.

There is a clear absence of transparent and evidence-based comparisons of different offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining environmental effects make this lack of analysis particularly concerning. Consequently, it is impossible to conclude that the proposed siting is the least damaging option.

These inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been thoroughly examined to mitigate impacts on sensitive sites, including culturally and spiritually significant areas like Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of a comparative analysis imply that the application has not effectively applied mitigation by design, instead relying on mitigation measures that would only be implemented after design completion.

As a result, the application does not demonstrate that environmental harm has been adequately minimised through careful site selection, layout, and infrastructure routing. This represents a neglect of the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a comprehensive alternatives assessment, it is not possible to conclude that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, these deficiencies significantly compromise compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a crucial omission that underlines the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful decision.

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 application raises significant concerns regarding its compliance with established evidential standards, particularly in relation to the integrity of protected sites. The ornithological assessment reveals internal inconsistencies and substantial gaps in evidence that critically undermine its conclusions. Despite the west coast of the Isle of Lewis hosting internationally important seabird populations, which are already experiencing declines, the application fails to adequately demonstrate that these species will not face adverse impacts. It is particularly troubling that the development is situated within vital foraging areas and migratory pathways, yet the assessment does not thoroughly evaluate the potential risks associated with displacement, collision, or habitat loss.

A serious contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously making a case for Habitats Regulations derogation—a process only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment,

suggesting that the conclusions presented lack robust support from the evidence provided. Furthermore, there is insufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment neglects to fully account for the importance 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 appear likely to underestimate mortality rates, especially in instances where baseline data is lacking and species behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor poses an additional risk, potentially creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality within this corridor or its potential effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This activates the precautionary principle, thereby hindering a lawful conclusion in favour of consent.

Additionally, the deficiencies noted signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not suffer adverse effects positions the proposal in direct contradiction to national policy.

Overall, the unreliability of the assessment stems from its internal contradictions, methodological shortcomings, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead of acknowledging these elements as dynamic and living, the application treats heritage as a collection of isolated and static features, neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual practice; however, the assessment erroneously categorises them as static entities, disregarding their continued relevance, significance, and the potential impacts of development on their surrounding environment. This

mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their importance in the lives of the community.

Moreover, the application neglects to assess intangible cultural heritage elements, such as the Gaelic language, traditions, and the established relationship between the community and the coastal landscape. These aspects are crucial to the area's identity but are completely absent from the assessment, marking a significant oversight. Without addressing these elements, it is impossible to gain a full understanding of the cultural implications of the proposed development.

There are additional concerns regarding the rights of the community and their engagement in this process. The Gaelic-speaking population has a distinct cultural identity recognised as characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement not only undermines the validity of the assessment but also fails to adhere to established principles of participation in decisions that affect cultural and environmental matters.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The failure to conduct this assessment means that the competent authority is unable to fulfil its legal responsibilities in evaluating the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the preservation of historic assets and places. The disregard for both tangible and intangible heritage, alongside the failure to recognise living cultural practices, represents a clear breach of policy mandates.

In summary, the neglect to properly assess living heritage, intangible cultural values, community rights, and statutory requirements results in a notable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not sufficiently support an understanding of the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Summaries that are available suggest that residents are already experiencing

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a dominating 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 fails to adequately reflect the magnitude of this change or the sensitivity of the environment.

This application does not properly convey the significant visual impacts resulting from the scale and location of the turbines. Their presence would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities of naturalness and remoteness. Furthermore, methodological concerns arise regarding the selection and presentation of visual viewpoints; there is evidence that these viewpoints do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such omissions introduce a risk of underestimating the magnitude of the visual impact, undermining the reliability of the assessment.

Moreover, there is a notable deficiency in assessing the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context that connects visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently assessed.

From a policy standpoint, the proposal conflicts directly 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. Additionally, the lack of a robust worst-case assessment further undermines claims of compliance with policy. It is evident that the identified impacts cannot be effectively mitigated; the scale, height, and proximity of the turbines would result in a presence that is dominant and unavoidable. The resulting change is therefore fundamental and permanent, rather than one that could be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks 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 assessment of the onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts from this single integrated project. The offshore turbines and the onshore works are closely connected; however, they are evaluated independently. This fragmented approach masks the true extent of the environmental and socio-economic repercussions.

Included in the onshore elements are 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, which serves as a significant carbon store and is an ecologically delicate habitat. The application fails to provide a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively; yet, the division of offshore and onshore components results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that adequate avoidance measures have been implemented. This reveals a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises concerns about deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project as a unified whole 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 significantly weakens the application.

In summary, the disjunction of project components, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that will be visible from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This will fundamentally change the night-time environment.

There is no evaluation of the lighting's impact on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important because dark skies are crucial to the area's identity and are becoming increasingly relevant to tourism sectors like astro-tourism. The lack of consideration for these impacts represents a clear gap in the environmental and landscape assessment.

Moreover, the application fails to assess the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, which can lead to disorientation and a higher 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 risk of increased mortality remain unexamined.

The reliance on daytime survey data within the ornithological assessment is a further issue, as it does not account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, but this has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without assessing nocturnal effects, it is impossible to determine if protected species or designated sites will be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved. This engages the precautionary principle and hinders a lawful determination.

From a policy perspective, the absence of this assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also affects the overall evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards required for sustainable development when evaluated against statutory responsibilities, national policies, and evidence-based criteria. This application echoes the primary concerns that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Currently, this proposal is presented under a strengthened policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant issue with the application is its lack of a comprehensive and reliable evidential foundation for assessment. It exhibits critical gaps in baseline data, utilises

an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it omits important impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

There are evident procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the nondisclosure of the complete Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

Overall, the application is fundamentally unfit for determination, both procedurally and substantively. The extensive information gaps, combined with policy inconsistencies and unresolved environmental risks, obstruct any lawful and evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory measures to necessitate the submission of the missing information.

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

Additional Comments

Previous application for similar projects have progressed without sufficient consultation or consideration of the very likely impacts if they had been allowed to proceed.

Other, smaller, projects have progressed, sometimes with the consent of local communities, only to prove inadequate or failing to meet with the expectations of the original specified aims. Often, such projects have shown to be inconsistent with the much advertised supposed benefits of the original proposals.

The levels of service provided by the existing electrical network infrastructure still don't provide the reliable supply of uninterrupted electrical power to local businesses and households that the rest of our country take for granted. The necessary improvements to current service levels should be dealt with before any projects such as this are considered, and even then, the objections listed above should always be considered as priorities over profit for distant companies or authorities.XX

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: B19817D1

Member of the public 1563

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and related documentation, highlighting several deficiencies related to planning, environmental concerns, cultural aspects, and procedural matters. The development is set to take place off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is critical missing environmental data, while the baseline information provided is limited and inconsistent. Furthermore, important aspects of the proposal remain undefined. The flexible design framework used hinders a clear understanding of likely significant effects. Additionally, the application relies on mitigation measures that have not yet been specified, making it impossible to assess their effectiveness. Consequently, the documentation does not allow for a complete or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are significant policy conflicts apparent in the application. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements that protect biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests needed for consent and undermine the competent authority's ability to conclude that the development is acceptable from a policy perspective.

The scale of this proposal is unprecedented in the area, with large turbines positioned near the shoreline. This raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The lack of adequate information, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and cannot support 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 essential completeness and transparency, failing to deliver a reliable account of the proposal's likely environmental

effects. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the application introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts reported may not accurately reflect the actual development, leaving both the public and the competent authority unable to comprehend the true extent of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured, evidence-based comparison of alternatives. This lack of analysis is a significant shortcoming, as it does not demonstrate that less harmful options have been identified and assessed in preference to more damaging solutions. Specifically, there is an absence of a transparent comparison of offshore locations, development

scales, and design configurations. The developer has not adequately considered the possibility of placing turbines further offshore, where impacts on visual aspects, ecology, and the coast would likely be mitigated. This is particularly crucial given the sensitivity of the West Lewis coastline and the importance of proximity to shore in determining environmental impacts.

Furthermore, the assessment of cable routing and landfall lacks sufficient evidence that alternative routes have been explored to minimise effects on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to provide a clear avoidance strategy, alongside the lack of comparative analysis, indicates that mitigation by design has not been adequately applied, leading to a reliance on post-design measures. Consequently, the application does not demonstrate that environmental harm has been minimised through careful consideration of site selection, layout, and infrastructure routing. This inadequacy represents a departure from the established mitigation hierarchy, inhibiting the competent authority from determining whether more suitable alternatives exist.

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, which emphasises the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission, reinforcing the overall conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

Notably, the assessment neglects to adequately identify and evaluate otters, which are classified as a European Protected Species. The application does not recognise their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to a significant oversight in assessing the potential effects of construction-related disturbances, noise, and increased activity. This omission undermines the conclusions drawn regarding the absence of significant effects on otters.

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

deficient baseline and diminishes the reliability of the conclusions reached.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application demonstrates significant deficiencies, ultimately leading to an unreliable conclusion regarding its environmental impact. A critical area of concern is the presence of contradictory findings within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously put forward a Habitats Regulations derogation case, which should only arise in situations where significant harm is anticipated. This inconsistency raises serious doubts about the validity of the assessment and suggests that the findings do not have a solid evidential foundation.

Additionally, the ornithological assessment contains major gaps in evidence, particularly in relation to the seabird populations that inhabit the west coast of the Isle of Lewis. This area is home to internationally important seabird species, many of which are already in decline. The application fails to convincingly demonstrate that these species will remain unaffected, particularly concerning the key foraging areas and migratory pathways where the development is sited. The implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

Moreover, the assessment does not sufficiently account for the significance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The methodologies used in the assessment are likely to underestimate the potential for mortality among species like Kittiwakes and Fulmars, especially given the lack of complete baseline data and a thorough understanding of their behavioural responses.

The siting of turbines within a recognised migratory corridor presents an additional risk,

effectively forming a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and the limitations of the modelling employed means that the standard of beyond reasonable scientific doubt has not been met. This situation necessitates engagement with the precautionary principle, undermining the validity of any conclusions drawn in support of the proposal.

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

In summary, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence collectively hinder a thorough evaluation of the potential impacts. Consequently, the application does not fulfil the statutory requirements necessary for proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage along the West Lewis coastline is a vital aspect of community identity, yet the assessment of this development disregards it as a dynamic cultural landscape, merging environment, language, tradition, and community. Instead, it treats heritage as mere static assets, neglecting their significant social, cultural, and spiritual roles within the community.

There is a notable shortfall in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are characterised. These sites are active burial grounds and places of spiritual significance, but the assessment simplistically categorises them as unchanging features. This failure to recognise their ongoing use and meaning, along with the potential impact of the development on their surroundings, leads to an incomplete understanding of the cultural ramifications and overlooks their significance in community life.

Moreover, the assessment neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely omitted from the evaluation, representing a serious oversight. Understanding the cultural impact of the development is impossible without these considerations.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity, with characteristics that

align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established participatory principles in decisions impacting cultural and environmental interests.

A significant procedural oversight is the non-compliance with the statutory requirement for an Island Communities Impact Assessment under the Islands (Scotland) Act 2018. The absence of this assessment obstructs the competent authority's ability to legally assess the social, cultural, and economic implications for the island community. This omission alone invalidates the determination process.

From a policy standpoint, these inadequacies put the proposal in direct opposition to National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect of both tangible and intangible heritage, alongside the disregard for living cultural practices, signifies a clear departure from policy standards.

In summary, the failure to adequately consider living heritage, intangible cultural values, community rights, and statutory requirements results in a considerable evidential gap. The cultural implications of the development remain unassessed, and the application does not furnish a robust foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of health, wellbeing, and social impacts in relation to the application is fundamentally flawed and lacks the necessary transparency for lawful appraisal. Although the developer commissioned a Social Impact Assessment, which included focus group discussions with local residents, the complete report remains unpublished. This gap in information is substantial, inhibiting both public awareness and the competent authority's ability to grasp the full range of social risks revealed by the developer's own research.

Reports indicate that local residents are already facing significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported effects are derived from direct engagement with the community, thereby eliminating any speculation regarding their validity. However, the absence of the complete assessment obstructs thorough scrutiny of these findings, hindering the evaluation of their significance in the decision-making process.

Additionally, the proposal is perceived as a serious threat to community identity and cohesion, with the developer's findings indicating an element of "cultural loss." Nevertheless, these critical social impacts have not been adequately factored into the primary application or afforded appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency directly undermines the Environmental Impact Assessment

process. Understanding the social, economic, and health implications of developments of this magnitude is crucial, particularly when community character and functioning may be at risk. By withholding the complete data set, the application lacks a robust evidential foundation necessary for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avert negative impacts. However, the available evidence suggests existing adverse effects that remain undisclosed. Without access to the complete assessment, the application cannot substantiate compliance with this policy.

The procedural ramifications are noteworthy. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material shortcoming in the application, failing to satisfy the evidential standards outlined in the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the position that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking, failing to capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic views, undeveloped nature, and pronounced remoteness. The introduction of large-scale turbines near the shoreline would create an unbroken and prominent industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

Moreover, the application does not fully portray the magnitude of this visual change. Given the size and proximity of the turbines, they would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately articulate this level of impact or its importance within the context of such a delicate landscape.

There are also serious methodological issues regarding the choice 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 valued landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

Another significant shortcoming is the lack of consideration for the interconnected

relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment regards these as separate entities rather than acknowledging their interconnections, leading to an incomplete appraisal of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which pertains to the protection of natural environments and historic assets. The scale of proposed changes is inconsistent with the need 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 policy adherence.

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

In summary, the assessment does not accurately depict the impact scale, the environment's sensitivity, or the interdependent 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 application lacks crucial detail necessary for a comprehensive understanding of the environmental risks associated with construction and pollution. Significant seabed preparation and installation activities are proposed within a challenging high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans presented. Instead, the application relies on unspecified mitigation and contingency measures that would be prepared only after consent is granted, which severely limits the ability to assess their adequacy or effectiveness at this stage.

Particularly alarming is the proposal’s failure to adequately consider the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are susceptible to sediment disruption and contamination. While the application acknowledges the potential risks of sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail the preventative, control, or monitoring measures that would be put in place to address these risks.

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

resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these disturbances. This uncertainty extends to potential impacts on marine species and habitats, which have already been identified as sensitive within the broader assessment context.

Moreover, the absence of detailed emergency response procedures adds to the growing concerns surrounding this application. By postponing contingency planning until after consent, the proposal hinders an evaluation of whether adequate safeguards are established for responding to pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess the environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short of demonstrating compliance with policy requirements related to environmental protection and water quality.

In summary, the application's deficiencies—including the lack of defined mitigation measures, the absence of detailed management plans, and uncertainties surrounding potential impacts—render the assessment materially inadequate. These issues prevent a solid evaluation of construction and pollution risks and support the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. It fails to demonstrate that these critical uses and habitats can be safeguarded without substantial disruption.

One major concern is the assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence indicating that there are alternative fishing grounds that are accessible and able to bear the additional pressure. This gap in information is crucial, as the potential for displacement risks overfishing in other areas, which could lead to broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions for fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents significant risks to marine species, particularly due to underwater noise created during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb marine life across considerable distances, notably affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming;

nonetheless, the application minimizes the importance of these effects without adequate evidence to support such claims.

There is a clear contradiction within the application regarding the requirement for licences to permit harm to European Protected Species, while simultaneously categorising impacts as negligible. This inconsistency undermines the assessment's credibility and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally incomplete, as it does not account for the full range of impacts resulting from what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore works is significant; however, these components have been evaluated separately. This fragmented approach obscures the comprehensive environmental and socio-economic effects that arise from the project.

Onshore activities entail the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. The excavation activities are particularly concerning as they traverse areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these onshore impacts, inhibiting a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively. Yet, the division between the offshore and onshore elements means that the combined impacts on

peatlands, habitats, and local communities remain inadequately explored. Furthermore, there are significant risks to sensitive habitats, including machair systems and peatland environments, which are recognised as deserving policy protection. The application fails to show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, revealing a substantial gap in evidence concerning biodiversity protection.

The proposal also raises serious issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the principles of renewable energy development. The application does not sufficiently address this concern or provide assurance that the overall carbon balance will remain advantageous.

Moreover, the routing of infrastructure through active croft land poses possible conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, prompting doubts about the project's feasibility and legal compliance. From a policy standpoint, the failure to assess the project in its entirety, while also not demonstrating adequate protection of peatlands, habitats, and land use interests, is at odds with both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's credibility.

In summary, the disjointed assessment of project components, the absence of thorough evaluations, and the lack of evidence regarding environmental and land use impacts result in a part of the application that is incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a critical failure in the Environmental Impact Assessment. The absence of evaluation for nocturnal impacts makes it impossible to ascertain if protected species or designated sites would suffer adverse effects. Consequently, the evidential standard needed to exclude harmful impacts beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

The West Lewis coastline, known for its exceptionally dark skies, plays a vital role in the area's environmental quality, cultural identity, and tourism potential. However, the proposal introduces permanent red aviation lighting, which would be visible over vast distances, creating a continuous "wall of light" that would drastically change the night-time landscape. The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been assessed, despite the significance of dark skies to the region's identity and the burgeoning astro-tourism sector.

Moreover, the lack of evaluation extends to nocturnal wildlife, with species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel being particularly

sensitive to artificial lighting. These species are prone to disorientation and increased collision risk due to phototaxis, yet the application fails to include any lighting impact assessment or phototaxis study. The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it fails to capture nocturnal activity or the associated risks. Kittiwakes, for example, may forage or migrate at night and are also susceptible to disorientation from artificial lighting, but this risk remains unaddressed.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which aims to protect natural places and maintain environmental quality. Furthermore, the lack of consideration for the night-time character significantly undermines the overall assessment of landscape and seascape impacts, which are integral to the environment.

In summary, the failure to assess dark skies and nocturnal wildlife constitutes a substantial evidential gap, leaving the application incomplete and incapable of justifying a lawful decision. The absence of baseline data, impact modelling, and species-specific analysis further illustrates the inadequacies of the proposal.

TOURISM

The evaluation of tourism impacts within the application is inadequate, neglecting to address the economic and social ramifications for a critical component of the Isle of Lewis economy. The island's tourism sector relies heavily on its scenic coastline, largely untouched landscapes, dark skies, and a sense of isolation. While the application notes that 86% of visitors are attracted by the scenery, it lacks a detailed quantitative analysis of how extensive offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has experienced substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Despite this progress, the application fails to explore how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added and the broader economic resilience. Without such an evaluation, it remains unclear if the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the analysis does not consider the significance of environmental quality in bolstering tourism, particularly the value of pristine landscapes and dark skies for visitor experiences. This oversight, compounded by the absence of a Dark Skies Assessment, creates a notable gap in understanding the impact on an increasingly important segment of the local economy, including emerging markets like nature-based tourism and astro-tourism.

For an island community that exhibits limited economic diversification, the neglect of tourism impacts carries broader implications for employment, local enterprises, and the sustainability of the community. The failure to conduct a proper Island

Communities Impact Assessment means that these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. Furthermore, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to properly evaluate the economic ramifications of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a significant evidential shortfall. This situation hinders a thorough appraisal of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties and national policy. It echoes the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite now being framed within a more robust policy context that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application has not satisfactorily addressed these issues.

Critical gaps are evident in the evidential basis provided for assessment. The use of an undefined design envelope is troubling, and the application relies on unspecified mitigation measures while omitting essential impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment lacks completeness, which hinders a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also apparent. Notably, the absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment signifies a substantial omission. These inadequacies inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, ultimately rendering the application unsuitable for determination.

The proposal conflicts with the National Planning Framework 4. It does not adequately protect biodiversity, natural areas, and cultural heritage, nor does it demonstrate that health and wellbeing effects are acceptable. The absence of tourism impact modelling further clouds the assertion of net economic benefit. Moreover, there has been insufficient assessment of the cumulative impacts from both offshore and onshore components, obscuring effects 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. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Significant and irreversible alterations to a highly sensitive landscape would also arise from this proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and repercussions on tourism represent enduring effects that cannot be mitigated to an acceptable standard.

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

Additional Comments

The environmental and visual effects

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: 9FC32508

Member of the public 1564

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation highlights significant planning, environmental, cultural, and procedural shortcomings. This development, located off the west side of the Isle of Lewis, occupies an area noted for its Atlantic-facing coastline, near-pristine environment, and deep cultural significance. Concerns regarding the scale, proximity, and design of the proposal raise urgent questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a robust evidential basis for making a lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Key components of the proposal remain undefined, and the use of a flexible design framework obscures the understanding of likely significant effects. Moreover, the proposal relies on unspecified mitigation measures, which makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust supporting evidence.

Moreover, the proposal conflicts with established policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such discrepancies directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to assess the development's acceptability within policy frameworks.

The unprecedented scale of this proposal, with large turbines positioned close to the shoreline, introduces serious concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy inconsistencies indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report associated with this proposal is fundamentally flawed, lacking a full, transparent, and dependable account of the anticipated environmental effects. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This situation hinders the ability to apply a worst-case scenario consistently, undermining the assessment's integrity. As a result, the impacts described may not accurately reflect the actual development that will be constructed, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Additionally, the application places considerable emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Consent is sought on the premise that any environmental harm will be addressed later, obstructing any meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures must be clearly outlined prior to determination.

Moreover, there are substantial evidential deficiencies within the application, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are put forward without adequate supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

Consequently, the application fails to meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including its stipulations related to biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly 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 collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The absence of a structured and evidence-based assessment of alternatives is a serious concern that undermines the integrity of the Environmental Impact Assessment regime. The application fails to provide a comprehensive comparison of potential offshore locations, development scales, or design configurations that could have been

less harmful. Instead, it offers a narrative account detailing the evolution of the project, without showing that the developer has genuinely considered more environmentally friendly options, particularly those that could involve placing turbines further offshore. Given the significance of the West Lewis coastline, the proximity to shore plays a crucial role in determining impacts. This lack of analysis prevents any conclusion that the proposed siting is indeed the least damaging option available.

The inadequacies are further evident in the cable routing and landfall assessment, where the evidence suggesting that alternative routes have been explored is insufficient. This oversight includes sensitive areas with cultural and spiritual significance, such as Barvas Cemetery. The failure to implement a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than proactive measures designed to minimise harm.

Consequently, the application does not adequately demonstrate that environmental harm has been mitigated through careful site selection, layout, and routing of infrastructure. This neglect breaches the established mitigation hierarchy and leaves the competent authority unable to ascertain whether less damaging alternatives exist. Without a thorough assessment of alternatives, it cannot be claimed that the proposal is a sustainable or compliant solution.

From a policy standpoint, these deficiencies compromise adherence to the National Planning Framework 4, particularly regarding the safeguarding of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, ultimately leading to the 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 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 application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This region supports many seabird species that are already in decline, yet the ornithological assessment provided is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately evaluate the implications of habitat loss, displacement, or collision risk, despite the development being situated within key foraging areas and migratory pathways.

A fundamental contradiction exists in the application, where the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This approach is only necessary when significant harm is anticipated, which raises serious doubts about the reliability of the assessment. It suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial importance of these feeding grounds is inadequately addressed, and the reliance on modelling methods introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to

underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of the birds are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a significant 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 have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations been adequately 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, along with data gaps and limitations in the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in favour 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. Overall, 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 collectively lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application fails to recognise this connection, approaching cultural heritage and community identity in a fundamentally inadequate manner. Rather than viewing heritage as dynamic and ongoing, it treats it as a collection of isolated and static assets, neglecting their social, cultural, and spiritual significance within the community.

This shortcoming is particularly evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places of burial and spiritual practice, yet the assessment mischaracterises them as static features. It does not take into account their continued use, meaning, or the impact that development may have on their setting, leading to an incomplete evaluation of cultural effects and overlooking their role in community life.

Additionally, the assessment omits consideration of intangible cultural heritage, such as the Gaelic language and traditions, as well as the community's enduring relationship with the coastal environment. These aspects are vital to the identity of the area but are entirely absent from the evaluation, creating a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is mandated by the Islands (Scotland) Act 2018, and without it, the competent authority cannot legally 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 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, indicates a clear departure from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, leaving the true cultural cost of the proposal unaddressed.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is fundamentally flawed due to a lack of transparency surrounding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report remains unpublished. This creates a significant evidential gap, obstructing both the public and the competent authority from grasping the full extent of social risks as identified by the developer's own research.

Summaries indicate that local residents are already facing measurable stress, anxiety, and concern as a result of the scale and proximity of the proposal. These impacts arise from direct engagement, making them factual rather than speculative. However, without the complete assessment, there is insufficient scrutiny of these findings, which limits the capacity to ascertain their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly where community character and functioning could be at stake. The application, by omitting the full dataset, does not provide a comprehensive evidential basis to assess the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is crucial that development supports positive health outcomes and mitigates harm; however, existing evidence indicates adverse effects that remain undisclosed. Without the full assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of this situation are significant, as the competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material failure in the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed turbines is significantly lacking and does not adequately capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. Introducing large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to represent the true magnitude of the visual changes. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thus directly impacting visual amenity and undermining the naturalness and sense of remoteness that define the area. The assessment does not sufficiently communicate this level of impact or its significance within such a sensitive landscape context.

Concerns also arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the preservation of natural spaces and historic assets. The proposed changes are incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate, lacking the detail necessary to evaluate potential environmental effects. The proposal entails considerable seabed preparation and installation works in a high-energy Atlantic environment. However, the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful evaluation of their effectiveness or sufficiency.

This reliance on unspecified future measures is especially troubling given the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate information on how these risks will be prevented, controlled, or monitored.

There is uncertainty regarding the scale and behaviour of sediment plumes that may

result from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures intensifies these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are in place to address pollution incidents. This introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be evaluated prior to granting consent, and if this information is absent, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support a vital fishing industry. However, the proposal does not adequately demonstrate that these crucial uses and habitats can be preserved without significant disruption.

One major concern is the flawed assumption that fishing activities can be shifted without repercussions. The application lacks evidence showing that alternative fishing grounds are not only available but also accessible and capable of handling increased pressure. This significant omission raises alarm, as displacing fishing activities threatens to lead to overfishing in other areas, potentially resulting in detrimental economic impacts on the local fleet. Without a detailed and evidence-based analysis, the consequences for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The extensive use of high-energy hammer piling is likely to create disturbances over vast distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate supporting evidence.

There is a significant inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment does not address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and fishing activity displacement. 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 fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the proposal qualifies as sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed development lacks completeness, particularly regarding onshore infrastructure, which is crucial to understanding the impacts of this single integrated project. The offshore turbines and the onshore works are closely interconnected, yet they are treated as separate entities in the assessment process. This fragmented approach obscures the true scale of both environmental and socio-economic effects that arise from the project.

Onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment regarding these impacts means the overall environmental footprint of the project cannot be fully understood.

By deferring or excluding the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together. The division of offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The proposal does not sufficiently demonstrate that the impacts on these habitats have been adequately assessed or that effective avoidance measures have been implemented. This indicates a significant gap in evidence concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application falls short in addressing this concern or in proving that the overall carbon balance remains positive.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence to confirm that necessary consents or processes have been initiated, which casts doubt on the project's deliverability and legality.

From a policy perspective, the failure to assess the project as a cohesive entity and to show that peatlands, habitats, and land use interests are protected is in direct conflict with the National Marine Plan and the National Planning Framework 4. Moreover, the inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application introduces permanent red aviation lighting that will be visible over long distances, which could create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The assessment of dark skies and nocturnal wildlife is entirely lacking, representing a material omission within the Environmental Impact Assessment. The West Lewis coastline is defined by exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism value.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly significant considering the importance of dark skies to the area's identity and the emerging sectors of tourism such as astro-tourism. The failure to consider these impacts results in a clear gap in the overall landscape and environmental assessment.

Furthermore, the application does not address the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collision. The absence of any lighting impact

assessment or phototaxis study means there has been no evaluation of how aviation lighting may affect these species or contribute to increased mortality.

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

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

From a policy perspective, this omission is inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. Moreover, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an essential aspect of the overall setting.

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

TOURISM

The evaluation of tourism impacts is severely lacking and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The viability of tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions from tourism.

Significantly, tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not simulate how the potential industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a flourishing sector.

Additionally, the assessment neglects the critical role environmental quality plays in enhancing tourism, including the significance of unspoilt landscapes and dark skies for

visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts presents broader risks for employment, local enterprises, and the sustainability of the community. The absence of a thorough Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as mandated under the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify tourism impacts, analyse environmental influences on visitor behaviour, and account for the island's economic dependencies leads to a significant evidential void. This gap hinders a thorough assessment of the economic effects and underscores the conclusion that the application is inadequate.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm embodies a critical shortfall in fulfilling the principles of sustainable development as mandated by statutory duties and national policy. This application echoes the fundamental issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, it is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

The evidential basis provided in the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope persists. There is an overreliance on unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are overlooked. Consequently, the Environmental Impact Assessment remains unfinished, hindering a comprehensive understanding of significant effects and residual impacts.

Moreover, clear procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while failing to disclose a full Social Impact Assessment constitutes a serious omission. These failings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct contradiction to National Planning Framework 4, as it does not demonstrate the necessary protection for biodiversity, natural spaces, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

In conclusion, the application is procedurally and substantively unsuitable for determination. The multitude of information gaps, in conjunction with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or activate the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

Beyond understanding why our land and seas are allowed to be raped in the proposed ways!

For profits that in no way enhance the well being of the people who live on the islands - or the mainland coastal areas.
The people, who for generations have worked to not only preserve but continue the outstanding heritage which has been given and to be able to pass it on to the future generations.

Shame on all those who are trying to force this criminality!

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: 8206A245

Member of the public 1565

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. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Serious concerns arise from the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

Critical deficiencies are evident in the application, as it lacks an adequate evidential basis for a lawful determination. There are significant gaps in environmental data, and the available baseline information is both limited and inconsistent. Several key aspects of the proposal remain undefined, compounded by the use of a flexible design framework that hinders a clear understanding of the likely significant effects. Additionally, the reliance on unspecified mitigation measures prevents a proper assessment of 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 evidence.

There are also clear and substantial conflicts with 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 demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal as acceptable from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The cumulative effect 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 be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application demonstrates a critical lack of understanding regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity and characteristics of an Indigenous People, has not been afforded the process

of Free, Prior and Informed Consent. This failure to engage meaningfully with the community undermines the validity of the assessment and does not align with established principles that emphasise participation in matters affecting cultural and environmental interests.

Moreover, the assessment neglects the significance of intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These vital elements are essential to the area's identity but are glaringly absent from the evaluation, leading to a substantial oversight. The cultural impact of the development cannot be comprehensively understood without addressing these factors.

The examination of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than appreciating heritage as an active, living component of the community, the application adopts a narrow view, treating it as isolated and static assets.

Key deficiencies arise in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they are categorised as static features in the assessment. This mischaracterisation ignores their ongoing use and meaning, as well as the development's impact on their setting, resulting in an incomplete evaluation of cultural effects and a disregard for their significance within community life.

A significant procedural failing is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings directly conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the application's inability to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application falls short of providing a sufficient basis for understanding the true cultural cost of the project.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a reliable evaluation of ecological and socio-economic

impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the proposal does not adequately demonstrate that these vital habitats can be preserved without considerable disruption.

One major concern is the unsubstantiated assumption that fishing activity can be displaced without adverse effects. There is no evidence provided to indicate that alternative fishing grounds exist, are accessible, or are capable of accommodating increased pressure from displaced fishing efforts. This oversight is critical, as the potential for overfishing in other areas poses economic risks for the local fishing fleet. The absence of a thorough, evidence-based assessment means that the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances, impacting species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially in instances where harm is expected to a degree that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines and the associated onshore infrastructure fails to comprehensively address the impacts of what constitutes a single integrated project. These elements are inherently connected; however, they are treated separately in the assessment, leading to a fragmented analysis that obscures the overall environmental and socio-economic implications.

Key components of the onshore work involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Notably, these activities include excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The current application does not present a thorough evaluation of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By not adequately assessing onshore impacts, the application limits the ability to evaluate cumulative effects. The Environmental Impact Assessment process necessitates that all project elements are examined collectively; yet, the disconnection between the offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain unclear.

There are substantial risks to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application falls short of proving that the impacts on these habitats have been thoroughly examined or that appropriate avoidance measures are in place. This creates a significant gap in the evidence concerning biodiversity protection.

Concerns also arise regarding the carbon balance, as the disturbance of peatland releases stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The current application does not sufficiently tackle this matter or demonstrate that the overall carbon balance is advantageous.

Moreover, the proposed routing of infrastructure through active croft land poses potential conflicts with existing land uses and legal rights. The application does not provide sufficient evidence that the required consents or processes have been initiated, which raises doubts about the project's deliverability and lawful execution.

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 the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks any evaluation of the effects of artificial lighting on nocturnal wildlife, which is a critical omission within the Environmental Impact Assessment. Specific species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly susceptible to artificial lighting due to their phototactic responses, leading to disorientation and increased collision risks. There is no lighting impact assessment or phototaxis study included in the application, meaning the potential impacts of aviation lighting on these species and the consequent risk of increased mortality remain unassessed.

Furthermore, the assessment relies solely on daytime survey data, neglecting the nocturnal activity and associated hazards that many species face. For instance, Kittiwakes, which may forage or migrate during the night, are vulnerable to the disorienting effects of artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Additionally, the evaluation of dark skies is entirely missing, which represents a material oversight. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over extensive distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment. The absence of an assessment regarding the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors is particularly concerning, especially given the growing importance of dark skies to the local identity and tourism sectors such as astro-tourism.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely impacted. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and preventing a lawful determination. From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall setting.

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 results in an incomplete application, which is incapable of supporting a lawful determination.

TOURISM

The evaluation of tourism impacts in the application is fundamentally flawed and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's stunning coastline, largely untouched

landscape, dark skies, and overall sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantifiable assessment of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or their economic contributions.

Tourism has seen substantial growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the potential impacts of the industrialisation of the seascape and the consequent degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it is impossible to ascertain whether the development would provide a net economic benefit or adversely affect an established and thriving sector.

Furthermore, the assessment overlooks the significance of environmental quality in sustaining tourism, especially the value of pristine landscapes and dark skies to the visitor experience, as well as to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the implications for this recognised and expanding segment of the local economy.

In a context where the island community suffers from limited economic diversification, the failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been analysed as mandated by the Islands (Scotland) Act 2018.

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

Collectively, the deficiencies in quantifying tourism impacts, assessing environmental drivers of visitor behaviour, and acknowledging the island's economic dependence culminate in a significant evidential gap. This undermines 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 represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the fundamental shortcomings.

There are notable deficiencies in the evidential basis required for determining the application. Critical gaps exist in baseline data, and there remains an undefined design envelope alongside unspecified reliance on mitigation measures. Furthermore, key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism impacts, have been overlooked. Consequently, the Environmental Impact Assessment is insufficient, impeding a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct contradiction with National Planning Framework 4. It fails to adequately protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent and do not satisfy the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The vast array of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent on these grounds or employs the relevant regulatory provisions to obtain the necessary missing information.

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

Additional Comments

I grew up in Shawbost and having these hideous things put up ruins the scenery but is so insulting to the community. They have to positive impact to the island.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E9724AF4

Member of the public 1566

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. Our concerns stem from a thorough review of the Environmental Impact Assessment Report and supporting documentation, revealing significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural integrity. The development site is situated off the west side of the Isle of Lewis, known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise profound questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for lawful determination. Important environmental data is absent, baseline information is limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used inhibits a clear assessment of likely significant effects, while reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation does not allow for a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Moreover, there are evident and substantial policy conflicts. 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 fails to demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of this proposal, with large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy underscores the application's incompleteness, rendering it incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or dependable account of the expected environmental consequences of the proposal. A flexible Project Design Envelope is employed without firm commitments to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and hinders the consistent application of a worst-case scenario. Such a lack of clarity compromises the assessment's integrity and obscures the true extent of the environmental impacts, preventing both the public and the competent authority from fully grasping the potential effects of the development.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought based on the premise that environmental harm will be mitigated in the future, which obstructs a meaningful evaluation of the effectiveness of these measures and assessment of any residual impacts. This postponement of essential information to post-consent stages is procedurally improper and contradicts the intention of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly defined prior to decision-making.

The report also suffers from critical evidential shortcomings, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty surrounding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. This lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory obligations.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to the National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are established.

Collectively, the dependence on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information available.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall evaluation of social impacts, health, and wellbeing associated with the proposed development is insufficient and lacks the necessary transparency for a lawful assessment. Although the developer engaged local residents through a Social Impact Assessment and conducted focus groups, the complete report remains unpublished.

This omission creates a significant gap in evidence, hindering both public understanding and the ability of the competent authority to grasp the full extent of social risks identified by the developer's research.

Available summaries reveal that local residents are experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement and should not be regarded as speculative. However, without access to the complete assessment, proper scrutiny of these findings is impeded, limiting the capacity to ascertain their relevance 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 the developer's findings indicating a risk of "cultural loss." Despite this, such impacts have not been adequately incorporated into the main application or given the attention they warrant. The failure to disclose the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health consequences is vital for developments of this magnitude, particularly when community character and functionality may be at stake. The application's inability to present the full dataset results in an incomplete 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. Developments are expected to foster positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a substantial omission within the application, failing 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 current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines in close proximity to the West Lewis coastline threatens to fundamentally alter the area's character, which is defined by its open Atlantic horizon and a strong sense of remoteness. This industrial presence would result in a permanent and irreversible transformation of the landscape. The

assessment of seascape, landscape, and visual impacts is materially deficient, as it does not adequately reflect the scale of change or the sensitivity of the receiving environment.

Visual impacts are understated, as the application fails to fully capture the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities that define naturalness and remoteness. Moreover, the assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight risks underestimating the visual impact, thereby undermining the reliability of the assessment.

The interconnected relationship between landscape, seascape, and cultural heritage has not been sufficiently assessed. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting that relies on visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and disconnecting them from the natural horizon. This not only represents a visual impact but also leads to broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The anticipated scale of change is inconsistent with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

The impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. As a result, the change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in the assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental impacts. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment without providing fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures after consent has been granted, which obstructs any substantial assessment of their adequacy or effectiveness.

This approach raises particular concerns given the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be effectively prevented, controlled, or monitored.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the ability to assess whether appropriate safeguards are established to address pollution events. This situation introduces procedural risk and hinders the competent authority's capacity to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements set forth in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, and any absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to cause disturbances over large distances, impacting species such as dolphins. Concerns arise from the predicted disruption to a significant portion of the local bottlenose dolphin population; however, the application tends to downplay these effects without adequate supporting evidence.

An assessment of fisheries and marine life is critically lacking, as it does not provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast sustain both a diverse marine ecosystem and an active fishing industry. Yet, the application fails to illustrate how these vital uses and habitats can be safeguarded or sustained without substantial disruption. There is a fundamental issue with the assumption that fishing activity can be displaced without consequences. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This omission is crucial, as displacing fishing could lead to overfishing in other areas and might result in broader economic repercussions for the local fleet. A clear and evidence-based assessment is necessary to comprehend the impacts on fisheries and livelihoods properly.

Moreover, the application shows an inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, particularly when harm is anticipated to such a degree that it requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves infrastructure linked to offshore turbines and onshore works, which are not assessed as a single integrated project. This approach results in a

fragmented evaluation that obscures the comprehensive environmental and socio-economic impacts of the development. Onshore components, including cabling across protected moorland, a substation construction near Stornoway, and the necessary access infrastructure, are significant in their implications, particularly as they involve excavation in deep peat areas like Barvas Moor. This region serves as a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts limits understanding of the project's complete environmental footprint.

Furthermore, by not properly evaluating onshore impacts, the application hinders the assessment of cumulative effects that arise when all project elements are considered together. The Environmental Impact Assessment mandates that both offshore and onshore aspects be viewed in conjunction, yet their separation leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to establish that all impacts on these areas have been fully assessed or that suitable avoidance measures have been taken. This creates a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not present evidence that necessary consents or processes have been initiated, which brings into question the feasibility and legality of the proposal.

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

Overall, the separation of the project components, the absence of comprehensive assessment, and the lack of evidence regarding environmental and land use impacts contribute to rendering this aspect of the application incomplete and unreliable, obstructing a lawful determination.

TOURISM

The application demonstrates a critical deficiency in assessing tourism impacts, which is vital for a significant sector of the Isle of Lewis economy. The region’s wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are essential to attracting visitors. It is noted that 86% of tourists are motivated by the scenery, yet the application lacks a quantified assessment of how the proposed large-scale offshore infrastructure may influence visitor numbers, behaviours, or their overall economic contributions.

Tourism is not just a mere attraction; it has seen significant growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000

jobs and constituting up to 16% of the island's economy. However, the application does not explore the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or broader economic resilience. This absence of analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment overlooks the critical role environmental quality plays in tourism. Unspoiled landscapes and dark skies enhance visitor experiences and are increasingly important to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a substantial gap in understanding the repercussions on a recognised and burgeoning component of the local economy.

In an island community with limited economic diversification, neglecting the impacts on tourism carries wider 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 adequately examined, contrary to the requirements outlined in the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to prove alignment with the National Planning Framework 4, particularly regarding economic impact and the essential demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide the competent authority with adequate evidence to evaluate the economic ramifications of the proposal.

In conclusion, the failure to quantify tourism impacts, evaluate the environmental factors driving visitor behaviour, and recognise the island's economic dependence results in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm indicates a significant shortfall in meeting the principles of sustainable development as outlined by statutory duties and national policy. It echoes the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are substantial gaps in the evidential basis provided for the proposal. Notably, there is a reliance on an undefined design envelope, incomplete baseline data, unspecified mitigation measures, and key impact pathways that have been overlooked, such as those concerning nocturnal wildlife, the entirety of the onshore infrastructure, and the effects on tourism. This leads to an Environmental Impact Assessment that is insufficient, failing to offer a comprehensive understanding of the potential significant

effects or residual impacts.

Furthermore, the proposal displays evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set forth by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment is a significant deficiency. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal is at odds with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. It fails to establish that the health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact analysis. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties surrounding environmental risks remain, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, which in some aspects are inconsistent with each other. The evidence threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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 connections, and the adverse effects on tourism are all permanent changes that cannot be adequately mitigated.

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

Additional Comments

Let England have the turbines you just want to ruin the tourist industry on the island the island struggles to survive as it is and before you say about the jobs it will create where i live all you do is employ cheap foreign labour.

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: 1BA61545