Member of the public 1654

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development, especially in light of its scale, proximity, and design.

The application presents a troubling lack of sufficient evidential support for a lawful determination. There are crucial gaps in environmental data, and baseline information is both limited and inconsistent, leaving many aspects of the proposal undefined. The flexible design framework employed obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a comprehensive or informed assessment of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and serious policy inconsistencies with the proposal. It seems to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. Furthermore, the application does not convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's ability to affirm the development's acceptability in policy terms.

The unprecedented scale of this proposal, characterised by large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information provided, the reliance on undefined mitigation measures, the evidential weaknesses, and the clear policy non-compliance signify that the application is incomplete and inadequate for lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and does not offer a comprehensive, transparent, or reliable overview of the potential environmental effects associated with the proposal. Significant uncertainty arises from the adoption of a flexible Project Design Envelope that does not commit to specific dimensions, layouts, or configurations for the turbines. This uncertainty compromises the integrity of the assessment, leading to a situation where the impacts described may not align with the eventual development, thereby hindering both public understanding and the competent authority's grasp of the actual environmental consequences.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that any environmental harm will be mitigated at a later date obstructs a meaningful evaluation of their effectiveness and the assessment of residual impacts. This postponement of critical information to the post-consent phase is procedurally inappropriate and contravenes the aims of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly outlined before any determination can be made.

There are notable evidential gaps, including deficiencies in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. Such shortcomings contribute to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case scenarios, introducing scientific uncertainties that cannot comply with statutory obligations.

Consequently, the application does not fulfil the evidential standards mandated 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. The proposal fails to demonstrate alignment with National Planning Framework 4, which includes stipulations regarding the protection of biodiversity and environmental integrity, since it is not evident that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives in accordance with the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough assessment based on environmental effects, it offers a narrative of project evolution. This method does not adequately

demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has seriously explored the possibility of siting turbines further offshore, where the impacts on visual aesthetics, ecology, and the coastal environment would likely be diminished. Considering the sensitivity of the West Lewis coastline and the critical importance of proximity to shore for assessing impacts, the lack of such analysis precludes any assertion that the proposed siting is the least damaging option available.

The shortcomings are evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately considered to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and the failure to conduct comparative analysis indicate a neglect of mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more appropriate alternatives may exist. The deficiency in providing a robust alternatives assessment prevents a conclusion that the proposal is sustainable or compliant with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and does not provide a thorough understanding of the ecological receptors involved. This marine system is biologically active and sensitive, yet the baseline data presented is incomplete, and the methodologies used fail to accurately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight pertains to otters, a European Protected Species. The application does not sufficiently acknowledge their active use of coastal areas for foraging and movement. The assessment neglects to consider their core foraging ranges and behavioural patterns, which means the possible effects of construction disturbances,

noise, and heightened activity have not been properly evaluated. This lack of attention undermines the findings concerning the absence of significant effects on this species.

Similarly, the assessment of basking sharks suffers from notable deficiencies, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline, further diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based on assumptions rather than sound evidence. The insufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty concerning the actual level of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

The assessment falls short in demonstrating that seabirds associated with protected areas such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are already facing severe declines. The methodologies utilised are likely to underestimate mortality rates, especially given the lack of comprehensive baseline data and an incomplete understanding of behavioural responses.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a rich cultural landscape where the environment, language, tradition, and community are deeply intertwined. The assessment of cultural heritage and community identity is fundamentally inadequate, as it treats heritage merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are particularly overlooked. These sites serve as active places of burial and spiritual practice, yet they have been mischaracterised as static features in the assessment. This failure to acknowledge their continued use and the implications of development on their setting results in an incomplete evaluation of cultural effects, neglecting their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language and traditions, as

well as the long-standing relationship between the community and the coastal environment, is not assessed. These elements are essential to the area's identity and their absence represents a significant omission. Without this consideration, it becomes impossible to properly understand the cultural impact of the proposed development.

Concerns extend to community rights and engagement, particularly given that the Gaelic-speaking population holds a distinct cultural identity recognised as characteristic of an Indigenous People. The lack of a Free, Prior and Informed Consent process undermines the assessment's legitimacy, failing to uphold established principles of participation in decisions that affect cultural and environmental interests.

Compounding these issues is the critical procedural failure regarding the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

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

Overall, the failure to properly assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a solid 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, yet the full report has not been published. This lack of transparency creates a significant evidential gap, limiting both public understanding and the competent authority’s ability to evaluate the social risks identified in the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by direct engagement and not mere speculation. However, the failure to disclose the complete assessment prevents adequate scrutiny of these findings, ultimately hindering the determination of 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" highlighted in the developer's own findings. Despite this, these concerns have not been fully integrated into the main application or given the appropriate consideration they warrant. The withholding of the

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

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be affected. The absence of the complete dataset means that the application does not present a full evidential basis for weighing the benefits against the harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and avoid negative consequences. However, the available evidence suggests that existing adverse effects have not been fully disclosed, making it impossible to demonstrate compliance without the full assessment.

The procedural implications of this situation are substantial. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a significant omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the evaluation incomplete and unreliable. This undermines lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts, seascape, and landscape is significantly lacking and does not adequately capture the extent of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic views, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large turbines near the shore would introduce a persistent and overwhelming industrial presence, fundamentally changing this character and resulting in an irreversible alteration of the landscape.

Concerns arise regarding the magnitude of visual change conveyed by the application. The scale and location of the turbines mean they would dominate the views from residential areas, historic sites, and popular coastal locations. Such dominance would adversely affect visual amenity and diminish the defining features of naturalness and remoteness. The assessment fails to adequately reflect the significance of this impact within the context of such a sensitive landscape.

Methodological issues concerning the choice and presentation of visual viewpoints have also been identified. Evidence indicates that these viewpoints may not adequately portray the most sensitive receptors or the worst-case scenarios, particularly

concerning key cultural heritage sites and valued landscapes. This raises the possibility that the scale of visual impact has been understated, compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnected nature of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a larger landscape context, linked by visual and spatial relationships to the Atlantic horizon. By treating these heritage assets as isolated entities, the assessment fails to recognise their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This represents not just a visual impact but a broader cultural and spatial detriment that the application has not adequately assessed.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic sites. The level of change proposed is inconsistent with the necessity to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a thorough worst-case assessment further diminishes any assertions of policy adherence.

Additionally, it is evident that the identified impacts are not amenable to effective mitigation. The scale, height, and proximity of the turbines would result in a presence that is dominant and inescapable. Consequently, the resulting changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment provided lacks the necessary detail to effectively evaluate the potential environmental effects of the proposed construction and pollution risks. This project entails significant seabed preparation and installation work in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application leans on mitigation and contingency measures that would only be formulated after consent is granted. This approach limits the ability to assess their adequacy and effectiveness meaningfully.

The reliance on undefined future measures raises significant concerns, particularly given the sensitive nature 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 the potential for accidental chemical or oil spills, it fails to provide adequate details on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty further extends to the potential effects on marine species and habitats that are already identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the 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 at the determination stage.

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the Environmental Impact Assessment requirements. It is essential to assess likely significant effects and associated mitigation before consent can be granted; failure to provide such information renders a lawful determination impossible. 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 collectively render the assessment materially deficient. These deficiencies obstruct a robust evaluation of construction and pollution risks and strongly indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application presents an inadequate assessment of fisheries and marine life, failing to provide a reliable evaluation of both ecological and socio-economic impacts. There is a troubling assumption that fishing activities can be displaced without consequences, yet the application does not offer evidence that alternative fishing grounds exist or are accessible to accommodate the additional pressure. This significant omission raises concerns about potential overfishing in other areas and could have broader economic ramifications for the local fishing fleet.

Furthermore, the proposal carries substantial risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is anticipated to cause disturbances across large distances, which

could adversely affect species such as dolphins. Alarmingly, the predicted disturbance to a notable portion of the local bottlenose dolphin population is downplayed within the application, lacking sufficient supporting evidence to address these serious concerns.

There is also a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, as it acknowledges the requirement for such authorisation while simultaneously describing the impacts as negligible. This contradiction undermines the assessment's credibility and raises issues about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of onshore infrastructure, failing to consider the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are interlinked; however, the assessment treats them separately, which results in a fragmented analysis that obscures the overall environmental and socio-economic effects.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application has not adequately demonstrated that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating an evidential gap regarding biodiversity protection.

Moreover, the onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. These works involve excavation in areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The failure to provide a comprehensive assessment of these impacts inhibits a complete understanding of the project's overall environmental footprint.

The lack of consideration for cumulative effects is evident, as the application has either excluded or deferred assessment of onshore impacts. The Environmental Impact Assessment process necessitates that all components of a project be evaluated collectively. The fragmented treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

Concerns are also raised regarding the carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application has not sufficiently addressed this matter or shown that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that necessary consents or processes have been initiated, calling into question 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 is at odds with the National Marine Plan and the 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 thorough assessment, and the lack of evidence regarding environmental and land use impacts result in this part of the application being incomplete and unreliable, which prevents 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 assessment of tourism impacts associated with the application is fundamentally flawed and does not adequately evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. With tourism having expanded notably from £65 million in 2017 to over £81.5 million, it currently supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. However, the application does not adequately model how the industrialisation of the seascape and the potential degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the community.

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

Assessment exacerbates this deficiency, resulting in a significant gap in understanding the impacts on a recognised and growing segment of the local economy.

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

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

SUMMARY

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

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

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

Furthermore, the proposal contradicts the National Planning Framework 4, failing to demonstrate biodiversity protection, acceptable health and wellbeing impacts, or net economic benefits, as there is no tourism impact modelling. The assessment of

cumulative impacts from both offshore and onshore elements has not been adequately conducted, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

We as a family moved to Isle of Lewis to enjoy the natural surroundings and beautiful views. This will be spoilt forever if these monsters are built so close to shore. I can not understand how they can be green when they are filled with oil that have a huge potential to spill into the surrounding Sea. What happens if it does, it will pollute the machair and beaches before it is acknowledged because it is so close to the shore.

Yours faithfully,

[Redacted]

Member of the public 1655

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documents, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale of the proposal, alongside the positioning and design of the turbines, presents serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis required for lawful approval. Key environmental data is absent, baseline information is insufficient and inconsistent, and numerous aspects of the proposal remain undefined. The flexible design framework complicates the ability to ascertain likely significant effects, and the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are not substantiated by robust evidence.

The proposal exhibits clear and substantial conflicts with policy. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly relate to the statutory tests necessary for consent, diminishing the competent authority's capacity to determine that the development meets policy acceptability.

Moreover, the unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious 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. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a transparent or reliable account of the potential environmental effects of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hampers the ability to consistently apply a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts described may not accurately represent the actual development, which hinders both public understanding and the competent authority's evaluation of the true environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent on the premise that environmental harm will be mitigated later prevents a thorough evaluation of effectiveness and residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which requires likely significant effects and mitigation to be established before determination.

There are also substantial evidential gaps, including missing baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

Consequently, the application does not satisfy the evidential standards set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it fails to show that impacts have been fully assessed or that proper safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These issues impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application has significant flaws that raise serious concerns. It is clear that the west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence that these species will not be adversely affected. The proposed development is situated within crucial foraging areas and migratory

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

A major inconsistency within the application arises when the developer concludes that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is typically only necessary if significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn are not backed by the underlying evidence. Furthermore, the assessment lacks adequate evidence to demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds has not been fully acknowledged, and the reliance on modelling approaches introduces uncertainty, especially regarding species in severe decline, including Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly when baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses a further significant risk, as it effectively creates a barrier in a primary flight path that species use to travel between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of continued mortality in this corridor or the potential impact on species with relatively small global populations.

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

The identified deficiencies also indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places this proposal directly at odds with national policy. Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application significantly neglects the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas reveals a key shortcoming; these locations are active burial grounds and centres for spiritual practice, yet they are misrepresented as static features. This mischaracterisation disregards their ongoing significance and the impact

of development on their surroundings, leading to an incomplete understanding of cultural effects and overlooking their vital role in community life.

Moreover, the absence of an evaluation of intangible cultural heritage, including the Gaelic language and local traditions, compounds these deficiencies. The longstanding relationship between the community and the coastal environment is central to the area's identity but remains unaddressed in the assessment. Without an exploration of these crucial elements, it is impossible to grasp the full cultural implications of the proposed development.

Concerns regarding community rights and engagement are also paramount. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the integrity of the assessment and neglects established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, the procedural lapse is underscored by the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, thus inhibiting a lawful determination.

From a policy standpoint, these oversights directly conflict with National Planning Framework 4, particularly in terms of the protection of historic assets and places. The failure to assess both tangible and intangible heritage, alongside the lack of recognition of living cultural practices, constitutes a clear deviation from policy expectations.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency denies both the public and the competent authority the ability to fully comprehend the social risks identified through the developer’s own research. Available summaries highlight 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 and are therefore not speculative, yet the failure to disclose the complete assessment hinders proper scrutiny and limits understanding of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is seen as a direct threat to community identity and cohesion. The developer's findings identify “cultural loss,” but

these impacts have not been adequately integrated into the main application or given appropriate consideration. This withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, particularly when community character and functioning are at stake. The application does not provide the complete dataset necessary for a thorough assessment of the balance between benefits and harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development projects must promote positive health outcomes and avoid harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, there is no way to confirm compliance with this policy.

The procedural ramifications are considerable, as the competent authority cannot perform a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material failure within the application and does not satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and fails to capture the true scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a continuous and overwhelming industrial presence, drastically transforming this character and resulting in a permanent alteration of the landscape.

Moreover, the application does not effectively represent the extent of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to accurately convey the magnitude of this impact or its importance in the context of such a delicate landscape.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately reflect

the most sensitive receptors or the worst-case scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This raises the risk that the extent of visual impact has been minimised, casting doubt on the reliability of the assessment.

A significant shortcoming lies in the lack of consideration of the interconnected relationship between landscape, seascape, and cultural heritage. Locations such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape setting interconnected with the Atlantic horizon. The assessment treats these heritage sites in isolation, failing to acknowledge their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly regarding the preservation of natural areas and historic assets. The scale of change is at odds with the necessity to protect landscape character, visual amenity, and the context of culturally significant sites. The absence of a robust worst-case assessment further weakens any assertion of policy compliance.

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

Collectively, these deficiencies in the assessment prevent an accurate representation of the impact scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. This leads to a conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to adequately assess construction and pollution risks, resulting in an incomplete evaluation of potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment, yet the application does not provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that are to be developed post-consent, limiting the ability to assess their adequacy or effectiveness.

This dependence on undefined future measures is especially concerning given the sensitivity of the receiving environment. The West Lewis coastline features clean

coastal waters and essential habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges various risks, including sediment mobilisation and accidental spills, it fails to detail how these incidents will be prevented, managed, or monitored.

Moreover, there is considerable uncertainty surrounding the extent and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty similarly extends to the potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By deferring critical contingency planning to a post-consent phase, the proposal obstructs the evaluation of whether sufficient safeguards are in place to tackle pollution incidents. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is essential to assess likely significant effects and mitigation measures before granting consent, and the absence of such information renders lawful determination impossible. Furthermore, the application does not demonstrate compliance with necessary policy requirements regarding environmental protection and water quality.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to account for dark skies and nocturnal wildlife, which represents a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, a crucial element that contributes to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, which would be visible over long distances, creating a pervasive "wall of light" effect across the western horizon. This change would drastically impact the night-time environment.

Moreover, there has been no assessment of how this lighting would affect visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the role dark skies play in shaping the area's identity and supporting burgeoning sectors like astro-tourism. The lack of consideration for these effects represents a distinct gap in the overall evaluation of landscape and environmental impacts.

Equally alarming is the absence of an evaluation concerning the impacts on nocturnal wildlife. Various species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting due to phototaxis, which can result in disorientation and a higher risk of collisions. The application lacks a lighting impact assessment or a phototaxis study, meaning there is no analysis of how aviation lighting might influence these species or increase mortality rates.

Additionally, the ornithological assessment is based solely on daytime survey data, failing to address nocturnal activity and its associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been adequately evaluated. The absence of night-time site-specific data creates a significant gap in understanding the ecological consequences.

Without proper evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard required to rule out negative effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this oversight contradicts National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It further weakens the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital aspect of the overall ecosystem.

In summary, the lack of assessment regarding dark skies and nocturnal wildlife leads to a profound evidential gap. The absence of baseline data, impact modelling, and species-specific analysis ultimately renders the application insufficient and incapable of facilitating a lawful decision.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards required for sustainable development when evaluated against statutory responsibilities, national policies, and evidence-based criteria. This application echoes the primary concerns that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Currently, this proposal is presented under a strengthened policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant issue with the application is its lack of a comprehensive and reliable evidential foundation for assessment. It exhibits critical gaps in baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it omits important impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

There are evident procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the nondisclosure of the complete Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

Overall, the application is fundamentally unfit for determination, both procedurally and substantively. The extensive information gaps, combined with policy inconsistencies and unresolved environmental risks, obstruct any lawful and evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory measures to necessitate the submission of the missing information.

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

Additional Comments

I was born and brought up in Barvas and spend most of my Summers on that Machair. That view is so beautiful, please don’t take that away from us. We understand how lucky we are to have this on our doorstep and our communities depend on the tourism it brings. Why do you want to take that away from 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: 5BFB286A

Member of the public 1656

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. Concerns regarding the compatibility of the development with statutory requirements, national policy, and the principles of sustainable development are raised due to the scale, proximity, and design of the proposal.

An adequate evidential basis for a lawful determination is notably absent. Critical environmental data has not been provided, baseline information is limited and inconsistent, and important aspects of the proposal remain undefined. The application employs a flexible design framework, which hinders a clear understanding of potential significant effects. Furthermore, there is reliance on unspecified mitigation measures, which prevents assessment of their effectiveness. Consequently, the documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These issues directly affect the statutory tests required for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal in this location, with large turbines placed near the shoreline, raises serious concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The current assessment of the development proposal inadequately addresses the cultural heritage and community identity of the West Lewis coastline. This area is more

than just a collection of historical sites; it represents a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application simplifies heritage to mere static features, neglecting their dynamic social, cultural, and spiritual roles within the local population.

Particularly concerning is the treatment of culturally significant locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual significance. However, they are mischaracterised as static elements, with the assessment failing to recognise their ongoing use and the implications of development on their surroundings. This oversight leads to an incomplete understanding of the cultural implications, disregarding their vital place in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language, local traditions, and the enduring connection between the community and its coastal environment. These aspects are essential to the area's identity but are conspicuously absent from the evaluation, reflecting a critical omission. Ignoring these factors means that the cultural ramifications of the development remain poorly understood.

The rights and engagement of the community are also at stake. The Gaelic-speaking population has a distinct cultural identity that aligns with the characteristics of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully raises questions about the validity of the assessment and disregards established principles of participation in decisions that affect cultural and environmental matters.

A further significant issue is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this necessary evaluation, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This absence alone renders the assessment deficient and compromises lawful decision-making.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to 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 acknowledge living cultural practices, clearly deviates from policy requirements.

In summary, the collective failures to evaluate living heritage, intangible cultural values, community rights, and adhere to statutory obligations culminate in a substantial evidential gap. The application does not offer a sufficient basis for assessing the genuine cultural costs of the proposed development.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment significantly undermines the transparency necessary for a lawful evaluation of the proposed development. Although the developer engaged local residents through focus groups as part of the Social Impact Assessment, the absence of the complete report creates a substantial evidential gap. This gap hinders both public understanding and the competent authority's ability to assess the social risks identified through the developer's own research.

Available summaries reveal that residents are currently experiencing measurable levels of stress, anxiety, and concern regarding the scale and proximity of the proposal. These impacts are based on direct engagement, thus are not speculative. However, without access to the full assessment, there is an impediment to scrutinising the findings thoroughly, which in turn restricts the ability to evaluate their significance within the decision-making framework.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite these implications, they have not been adequately addressed within the main application or given the necessary weight in the evaluation process. The retention of the full Social Impact Assessment clouds the true human and social costs associated with the development.

This lack of transparency not only affects the Social Impact Assessment but also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide the complete dataset means that the application does not offer a full evidential basis to assess the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm, yet the existing evidence indicates adverse effects that have not been fully acknowledged. Without the full assessment, compliance with this policy cannot be verified.

The procedural ramifications are notable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the unavailability of the complete Social Impact Assessment. This deficiency constitutes a material omission in the application, failing to satisfy the evidential obligations of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, combined with the documented evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reaffirms the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed and does not adequately account for the significant scale of change or the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the extent of this visual change accurately. The large scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not sufficiently convey the significance of this impact in the context of such a sensitive landscape.

Concerns are also evident regarding the methodology used in selecting and presenting visual viewpoints. There is evidence suggesting 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 the risk of underestimating the magnitude of visual impact, thus compromising the assessment's reliability.

Another critical deficiency is the failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets instead of 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, altering the context in which heritage assets are perceived and affecting their relationship with the natural horizon. This represents not only a visual impact but also a more significant cultural and spatial harm that has not been properly assessed within the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to marine species and habitats that have been identified as sensitive in the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines and onshore works are inherently connected but are evaluated separately. This separation leads to a fragmented approach, obscuring the overall environmental and socio-economic effects.

Onshore components consist of cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered together. However, the division between offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and communities.

There are significant risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place. This creates an evident gap in biodiversity protection.

The proposal also raises issues regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is beneficial.

Additionally, routing the 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, casting doubt on its deliverability and legal compliance.

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

Overall, the separation of project components, lack of a comprehensive assessment, and absence of evidence regarding environmental and land use impacts result in this portion of the application being incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a critical gap in the Environmental Impact Assessment. The West Lewis coastline, noted for its exceptionally dark skies, is integral to environmental quality, cultural identity, and tourism value. The proposal's introduction of permanent red aviation lighting would result in a continuous and intrusive "wall of light" effect across the western horizon, significantly altering the night-time environment.

There is no evaluation of how this lighting might 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 area's identity and the growing sector of astro-tourism. As such, the lack of consideration for these factors creates a notable deficiency in the overall assessment of landscape and environmental impacts.

Moreover, the application does not address potential impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially susceptible to artificial lighting due to phototaxis, which could lead to disorientation and an increased risk of collision. The failure to include any lighting impact assessment or phototaxis study further neglects to evaluate the potential effects of aviation lighting on these species and the risk of increased mortality.

The reliance on daytime survey data in 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 due to artificial lighting, a risk that has not been assessed in this context. The lack of site-specific night-time data presents a significant obstacle to understanding ecological impacts adequately.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, the lack of assessment undermines the broader evaluation of landscape and seascape impacts, as the night-time character is a fundamental 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 fundamentally fails to meet the criteria for sustainable development when evaluated against statutory

responsibilities, national policy, and evidential standards. The application 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 new application, however, is being assessed within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis provided for determination. There are notable deficiencies in baseline data, an ambiguous design envelope, and reliance on unspecified mitigation measures. Moreover, it overlooks significant impact pathways, including nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to offer a comprehensive understanding of likely significant effects or residual impacts.

There are pronounced procedural deficiencies as well. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties under the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks, which may be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and barring a lawful conclusion that impacts are acceptable.

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

Overall, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise the appropriate regulatory provisions to demand the submission of the missing information.

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

Additional Comments

I strongly object. Our island is a precious, peaceful and beautiful place filled with rich heritage, community spirit, unspoilt scenery and a haven for wildlife.

There is a very clear public objection to this proposal, as evidenced by a survey undertaken locally. The people who this proposal will have a direct impact on are not being listened to. This feels like an under handed, done deal and our voices as a community have been not been heard at all. There are very, very few people who live on the north and west coast of Lewis who want this. They will be directly affected by it and feel the impacts of this completely ridiculous proposal for years and years. Where is the democracy?

The damage that this offshore wind farm and onshore works will have on our marine ecosystems, views and our fragile Machair and moorland habitats will be devastating and more needs to be done to protect them now more than ever. The communities should not be bullied into accepting its destruction as part of a ‘green’ agenda.

Yours faithfully,

[Redacted]

Member of the public 1657

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted within the relevant marine licensing and Environmental Impact Assessment frameworks. The development is situated off the west side of the Isle of Lewis, an area known for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal highlight its incompatibility with statutory requirements, national policy, and the principles of sustainable development.

The application presents significant deficiencies, particularly an inadequate evidential basis for lawful determination. Key environmental data is notably absent, while baseline information remains limited and inconsistent. Furthermore, many aspects of the proposal are not clearly defined. The use of a flexible design framework obscures a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation falls short of providing a complete understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by credible evidence.

Substantial policy conflicts are evident, as the proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not sufficiently demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity are achievable. These discrepancies directly challenge the statutory tests necessary for consent, undermining the competent authority's capacity to deem the development acceptable according to policy standards.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant worries about landscape capacity, visual dominance, and environmental consequences. Collectively, the insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application exhibits significant evidential deficiencies, highlighted by gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and

significance of impacts, particularly in instances where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to align with statutory requirements.

Moreover, the proposal does not adequately demonstrate compliance with National Planning Framework 4. The requirements related to biodiversity protection and environmental integrity cannot be satisfied as the assessment does not illustrate that impacts have been thoroughly examined or that necessary safeguards are established. The application seeks consent based on a reliance on unarticulated mitigation measures, monitoring strategies, and management plans that remain undefined. This approach results in an evaluation that is procedurally unacceptable, as it conflicts with the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly determined before a decision is made.

The Environmental Impact Assessment Report is materially deficient and fails to deliver a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The application's use of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, contributes to considerable uncertainty and hampers the consistent application of a worst-case scenario. This undermines the integrity of the assessment and precludes both the public and the competent authority from comprehending the true extent of environmental effects.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the deficiencies in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, ultimately leaving the competent authority unable to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to deliver a complete and dependable understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is sensitive and biologically active, yet the existing baseline data is insufficient, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the evaluation does not provide a solid evidential basis for understanding potential impacts.

One significant oversight is the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active usage of

coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This lack of assessment undermines any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also displays notable deficiencies, as the reliance on aerial surveys introduces a significant detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to include or appropriately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that the conclusions of negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of adequate baseline data prevents a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the true scale of risk posed to marine species and their habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns, primarily due to its internal inconsistencies and the notable gaps in evidence that fundamentally undermine its conclusions. The Isle of Lewis, particularly its west coast, hosts seabird populations of international importance, many of which are already experiencing declines. The application does not sufficiently demonstrate that these species will remain unaffected by the proposed development. Key foraging areas and migratory pathways are integral to these seabirds, yet the implications of potential displacement, collision risks, and habitat loss have not been thoroughly evaluated.

A troubling contradiction exists within the application's findings. While the developer asserts that there will be no significant adverse effects, they concurrently propose a

Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn lack solid support from the available evidence. The assessment falls short in providing adequate proof that seabird populations associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be negatively impacted. The critical nature of these feeding grounds is inadequately addressed, and the use of modelling approaches raises uncertainties, particularly regarding species like Kittiwakes and Fulmars that are already in severe decline. Methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, as it poses a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not provide an adequate evaluation of the long-term consequences of sustained mortality in this corridor, nor does it consider the potential impacts on species with smaller global populations.

From a regulatory standpoint, the application does not satisfy the evidential criteria needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, coupled with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders the conclusion in support of consent unlawful.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development fails to adequately consider the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application approaches heritage in a reductive manner, treating it as a collection of isolated and static assets. This perspective ignores the ongoing social, cultural, and spiritual roles these heritage sites play within the community.

Significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised as static features despite being active places for burial and spiritual practice. This oversight fails to recognise their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete, disregarding the integral role these sites have in community life.

Moreover, the application neglects to address intangible cultural heritage, including the Gaelic language and traditions, which are essential to the identity of the area. The absence of these elements from the assessment is a critical omission, as it prevents a comprehensive understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population has 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 undermines the assessment's legitimacy and does not adhere to established principles for participation in decisions that affect cultural and environmental interests.

Furthermore, a vital procedural flaw is the lack 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, rendering any determination unlawful.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices represents a clear violation of policy requirements.

Overall, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not sufficiently justify the potential cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and fails to capture the full extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unspoilt Atlantic views, lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines positioned near the shoreline would create an industrial presence that is both continuous and dominant, leading to a permanent and irreversible alteration of this landscape.

The representation of the visual changes resulting from the application is insufficient. Given the scale and close proximity of the turbines, they are set to dominate the views

from residential zones, historical landmarks, and popular coastal areas. This intrusion would impact visual amenity directly and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the framework of such a sensitive landscape.

Methodological issues arise concerning the selection and display of visual viewpoints. Evidence indicates that the viewpoints presented may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to crucial cultural heritage sites and landscapes of high value. This raises concerns that the extent of visual impact may have been understated, thereby compromising the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notably, locations such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, interconnected through visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete analysis of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, fundamentally altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This situation represents not merely a visual impact but also a broader cultural and spatial detriment that the application has not sufficiently addressed.

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The magnitude of change is incompatible with the obligation to maintain landscape character, visual amenity, and the context of culturally significant locations. The lack of a thorough worst-case analysis 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 both dominant and unavoidable. Consequently, the change is profound and permanent, rather than reducible to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately reflect the degree of impact, the sensitivity of the environment, or the interconnected relationships between landscape and heritage. These shortcomings preclude a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies regarding the assessment of construction and pollution risks, failing to offer the necessary details for evaluating potential environmental effects. There is a substantial requirement for seabed preparation and installation works within a high-energy Atlantic environment, yet the

application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures is especially alarming, given the sensitivity of the receiving environment along the West Lewis coastline. This area supports clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not supply enough detail on the methods to prevent, control, or monitor these incidents.

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures when making a determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Assessment of likely significant effects and mitigation must occur prior to consent, and any absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal poses substantial risks to marine life and the local fishing industry, yet the assessment of fisheries and marine ecosystems is inadequate. The waters off the West Lewis coast are home to both a rich marine ecosystem and a vibrant fishing community. However, the application does not convincingly demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be shifted without adverse effects. The application lacks evidence regarding the availability or accessibility of alternative fishing grounds that could withstand increased pressure. This absence of information is troubling, as it raises the possibility of overfishing in other areas, potentially leading to broader economic ramifications for the local fishing fleet. Without a thorough, evidence-based evaluation, understanding the impacts on fisheries and associated livelihoods remains elusive.

Additionally, the proposal carries significant risks for marine species, particularly due to the underwater noise resulting from construction activities. Prolonged high-energy hammer piling is expected to cause disturbances over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population is a serious concern. Nonetheless, the application minimises the importance of these impacts without adequate supporting evidence.

There is a notable inconsistency in the application where the need for licenses to permit harm to European Protected Species is recognised, while simultaneously, impacts are described as negligible. This contradiction calls into question the reliability of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is anticipated to an extent that necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from multiple factors such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined pressures, it is impossible to determine the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can operate alongside existing marine users or mitigate unacceptable impacts on marine biodiversity, which precludes any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in evidence concerning fishing displacement, the undervaluation of acoustic impacts, and the internal inconsistencies significantly undermine the assessment's credibility. These shortcomings hinder a comprehensive evaluation of the potential consequences for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is significantly deficient, failing to capture the complete range of impacts from what constitutes a single integrated project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated in isolation. This fragmented assessment obscures the true extent of environmental and socio-economic

consequences.

Central to the onshore elements are the proposed cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. Without a thorough evaluation of these effects, the project's overall environmental impact remains unclear.

Furthermore, by omitting or postponing the assessment of onshore impacts, the application undermines the ability to effectively evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the division between offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are inadequately understood.

Significant risks to sensitive habitats, such as machair systems and peatland environments, are present and these areas are subject to policy protection. The application fails to show that these impacts have been fully evaluated or that suitable avoidance measures have been put in place, creating a noticeable evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disruption of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains positive.

Moreover, routing the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, raising doubts about its feasibility and legal compliance.

From a policy standpoint, the failure to assess the project as a cohesive whole and to adequately protect peatlands, habitats, and land use interests is inconsistent 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 conclusion, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. However, the application currently under consideration fails to address the effects of permanent red

aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This significant oversight fundamentally alters the night-time environment and compromises the visual amenity, landscape character, and overall experience of both residents and visitors.

There is also a notable absence of evaluation regarding the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting, which can lead to disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study means that it is impossible to gauge how this aviation lighting may affect these species or contribute to their mortality.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Additionally, species like Kittiwakes, which may forage or migrate at night, are susceptible to the disorienting effects of artificial lighting, yet this risk remains unexamined. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts that may arise from the proposal.

Without a proper assessment of these nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The application does not meet the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Moreover, it detracts from a comprehensive evaluation of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm epitomises a significant shortfall in meeting the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This latest application, presented under a more robust policy framework, still fails to adequately address concerns regarding biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough evidential basis for this application is lacking. There are notable deficiencies

in baseline data, the use of an ambiguous design envelope, unspecified mitigation measures, and the failure to address key impact pathways, such as nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These oversights hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal is at odds with the National Planning Framework 4. It does not adequately demonstrate the safeguarding of biodiversity, natural spaces, and cultural heritage, nor does it provide assurance that health and wellbeing impacts are acceptable. There is also a lack of evidence supporting a net economic benefit, as tourism impact modelling is absent. The failure to properly assess the cumulative impacts of both offshore and onshore components conceals the potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The incomplete assessments of marine ecology, seabirds, protected species, and marine mammals contain inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would bring about substantial and irreversible changes to a landscape that is highly sensitive. 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 consequences that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively inadequate for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory measures to obtain the necessary information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 203A80CB

Member of the public 1658

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely untouched environment, and vibrant cultural identity. There are pressing concerns regarding the proposal's scale, proximity to the shore, and overall design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for lawful determination. Critical environmental data is absent, with baseline information being both limited and inconsistent, and many key components of the proposal are inadequately defined. The reliance on a flexible design framework complicates the ability to ascertain significant environmental effects, and the unspecified mitigation measures hinder any meaningful assessment of their effectiveness. Consequently, the available documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

Moreover, the proposal presents clear and significant conflicts with established policies. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural environments, and public health. The application does not convincingly demonstrate adherence to national requirements aimed at safeguarding biodiversity, addressing climate considerations, and maintaining environmental integrity. These discrepancies directly affect the statutory criteria for consent and compromise the competent authority's ability to determine whether the development is acceptable under policy guidelines.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shoreline, raises considerable issues related to landscape capacity, visual impact, and broader environmental repercussions. Collectively, the lack of comprehensive information, dependence on undefined mitigation strategies, evidential shortcomings, and significant policy non-compliance illustrate that the application is incomplete and insufficient for lawful determination. Under these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the proposed development's environmental effects. A flexible Project Design Envelope, lacking specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity, making it impossible to ascertain a worst-case scenario, thereby hindering both public understanding and the competent authority's evaluation of the true environmental impacts.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise of addressing environmental harm at a later stage obstructs a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of essential information contravenes the procedural integrity of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before any determination is made.

There are also crucial evidential shortcomings, including insufficient baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. Such gaps result in uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without robust data to support these conclusions. This lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that fail to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not comply with National Planning Framework 4, which includes stipulations about biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the

project's evolution. This narrative fails to establish that less harmful options have been thoroughly identified, assessed, and selected over more damaging ones.

There is a distinct lack of transparent or evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has genuinely considered the possibility of siting turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Given the sensitivity of the West Lewis coastline, and the crucial role of proximity to shore in assessing impact, the failure to conduct such analysis precludes any conclusion that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, where evidence is insufficient to demonstrate that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that there has been no application of mitigation by design, resulting in an over-reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency weakens adherence to 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 significant omission that contributes to the overall conclusion that the application has not been adequately assessed and cannot underpin a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is insufficient and fails to offer a comprehensive understanding of ecological receptors. This region is characterised by its biological activity and sensitivity, yet the baseline data provided is incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of marine species. Consequently, the assessment lacks a solid evidential basis for evaluating impacts.

A significant gap in the assessment concerns otters, classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal areas for foraging and movement. This oversight extends to their core

foraging range and behavioural patterns, leaving the potential effects of construction disturbances, noise, and increased activity inadequately assessed. This deficiency undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where a reliance on aerial surveys introduces notable detection bias, particularly in the challenging conditions of the Atlantic. This method likely results in an underestimation of their presence when compared to established land-based observations that indicate frequent usage of these waters. The neglect to incorporate or thoroughly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that assertions of negligible or non-significant effects are largely based on assumptions rather than solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

Regulatory requirements under the Environmental Impact Assessment regime and National Planning Framework 4 are not met, as the application fails to properly identify or assess protected species. The uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Therefore, 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 inadequacies obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its reliability. The development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already declining. However, the application fails to prove to the necessary evidential standard that these species will not suffer adverse effects.

There are contradictions within the application itself. The developer claims that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and highlights that the conclusions drawn are not backed by adequate evidence.

The assessment lacks sufficient evidence regarding the seabirds connected to protected sites such as the Lewis Peatlands and St Kilda. It does not fully account for the significance of these feeding grounds and relies heavily on modelling approaches that introduce uncertainty, particularly for species facing severe declines like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially since the baseline data is incomplete and the behavioural responses of these species are not thoroughly understood.

The placement of turbines within a recognized migratory corridor adds a significant risk, creating a barrier along 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 within this corridor or the potential impact on species with limited global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to affirm that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, combined with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent.

Moreover, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of evidence. These issues impede a thorough evaluation of impacts and substantiate the conclusion that the application does not satisfy the statutory requirements essential for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that undermines the integrity of the evaluation process. While the developer has engaged in the collection of data through focus groups with local residents, the failure to publish the full report creates a significant evidential gap. This gap inhibits both public understanding and the competent authority's ability to fully assess the social risks identified through the developer's own research.

Evidence suggests that residents are currently facing measurable stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. However, the absence of the complete assessment restricts proper scrutiny of the findings, thereby limiting the capability to evaluate their significance in the decision-making framework.

Furthermore, there is substantial indication that the proposal is viewed as a direct

threat to community identity and cohesion, with the developer's findings highlighting a risk of “cultural loss.” Despite the recognition of these impacts, they have not been adequately incorporated into the main application nor given the necessary weight in the evaluation process. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency are far-reaching, as it undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The failure to provide the full dataset means that the application lacks a comprehensive evidential basis needed to assess the balance between benefits and harm effectively.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. The development is required to support positive health outcomes and mitigate harm, yet the available evidence reveals existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this essential policy cannot be established.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential standards outlined in 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 deficiency obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to be properly considered.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the interconnectedness of landscape and cultural heritage is significantly lacking and does not sufficiently consider the sensitivity of the receiving environment. The proposed large-scale turbines near the West Lewis coastline would introduce a continuous industrial presence that would fundamentally alter the area’s undeveloped character and open Atlantic horizon. This change would result in a permanent and irreversible transformation of the landscape.

Moreover, the application inadequately represents the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and sense of remoteness that define this region. The assessment fails to convey the true significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints in

the assessment. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the magnitude of visual impact, which undermines the assessment's reliability.

Additionally, there is a critical failure to evaluate the interconnected relationship among the landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments, are embedded in a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete understanding of the impacts on their cultural significance and setting.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This issue transcends visual impact, presenting a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which prioritises the protection of natural places and historic assets. The proposed scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further calls into question any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Consequently, the anticipated change is fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application depends on mitigation and contingency measures that will be prepared after consent. This reliance on undefined future measures raises concerns, especially given the sensitivity of the receiving environment. The West Lewis coastline has clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination.

The application notes risks such as sediment mobilisation and accidental chemical or oil spills but does not adequately detail how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, including the potential effects on sensitive marine species and habitats.

Furthermore, the absence of detailed emergency response procedures adds to these issues. By postponing contingency planning until after consent, the application limits the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information means a lawful determination cannot be achieved. The application does not demonstrate compliance with the policy requirements concerning environmental protection and water quality. Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts make the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented regarding fisheries and marine life is fundamentally inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. Off the West Lewis coast, there exists a rich marine ecosystem alongside a thriving fishing industry. However, the application does not provide assurances that these vital uses and habitats can be preserved or maintained without experiencing significant disruption.

A key concern arises from the assumption that fishing activities can be relocated without negative consequences. The application fails to furnish any evidence supporting the availability or accessibility of alternative fishing grounds that could accommodate additional pressure. This significant gap in information raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Additionally, the proposal poses considerable risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling over extended durations is likely to disturb marine life across extensive distances, notably affecting species such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is particularly

concerning, yet the application minimises the significance of these impacts without adequate supporting evidence.

There is a notable inconsistency within the application itself, where the necessity for licenses to permit harm to European Protected Species is acknowledged, while simultaneously describing impacts as negligible. This contradiction casts doubt on the assessment's credibility and raises issues regarding compliance with the Habitats Regulations, especially when harm is expected at levels necessitating legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thus obstructing any conclusions that the project can be considered sustainable.

In summary, the deficiencies highlighted—namely the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies—render the assessment incomplete and unreliable. These issues collectively hinder a thorough evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism value. The proposed project would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the region's identity and the emerging tourism sector of astro-tourism, this omission is especially troubling.

Moreover, there is no evaluation of how this lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to examine how aviation lighting might impact these species or contribute to mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which does

not capture nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts.

The failure to consider nocturnal impacts raises significant concerns about whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and thereby obstructing a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with the National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Furthermore, it undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application revisits the central concerns that resulted in the denial of the Lewis Wind Power proposal in 2008, which was deemed excessively industrialised. Presenting the application now under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not adequately address these issues.

Critical deficiencies exist in the evidential basis for the proposal. The baseline data is incomplete, there is continued reliance on an unspecified design envelope, mitigation measures are vague, and essential impact pathways, including effects on nocturnal wildlife, the full extent of onshore infrastructure, and tourism impacts, have not been thoroughly examined. Consequently, the Environmental Impact Assessment is deficient, failing to provide a comprehensive understanding of the significant effects or residual impacts that may arise.

The application also exhibits notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a clear violation of statutory duties under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment constitutes a significant omission, hindering the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience. These failures collectively render the application unsuitable for determination.

Furthermore, the proposal is at odds with the National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural environments, and cultural heritage. There is a failure to show that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling precludes any evidence of net economic benefit. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain ambiguous and potentially serious. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally contradictory. The evidential burden necessary to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and precluding a lawful determination that impacts are acceptable.

Additionally, this proposal would induce significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and the effects on tourism constitute permanent impacts that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct the ability to make a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or invoke relevant regulatory provisions to require the submission of the necessary missing information.

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

Yours faithfully,

[Redacted]

Member of the public 1659

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies across various dimensions, including material planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

The application lacks a sufficient evidential basis for a lawful determination. Important environmental data is absent, with baseline information being both limited and inconsistent. Additionally, critical elements of the proposal are not clearly defined. The flexible design framework employed does not allow for a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures hampers any evaluation of their effectiveness. Consequently, the submitted documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, while assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial conflicts with policy have been identified. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It has not demonstrated compliance with national requirements aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These policy conflicts directly affect the statutory tests required for consent and compromise the competent authority's ability to determine that the development meets acceptable policy standards.

The unprecedented scale of the proposal poses significant challenges, as large turbines are to be situated near the shoreline, raising serious concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to adequately account for the likely environmental effects of the proposal. The application utilises a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, which introduces significant uncertainty. This lack of commitment prevents a consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that will be constructed, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed later, thereby obstructing any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and conflicts with the Environmental Impact Assessment regime's objective, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold 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. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been fully assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding the adequacy of the assessment of marine ecology and protected species within the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the

provided baseline data is insufficient, and the methodologies employed fail to thoroughly capture species presence, behaviour, and habitat use. Consequently, the assessment does not deliver a reliable evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not appropriately acknowledge or assess their use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased activity have not been sufficiently evaluated. This oversight calls into question any conclusions drawn regarding the absence of significant effects on otters.

Furthermore, the assessment of basking sharks exhibits deficiencies, primarily due to reliance on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This reliance is likely to lead to an underestimation of the species' presence, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider this relevant data results in an incomplete baseline, thereby undermining the reliability of the conclusions drawn.

These methodological inadequacies lead to assertions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of adequate baseline data further hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk posed to marine species and 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 protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of these factors, the granting of consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application does not satisfy the evidential threshold required to demonstrate no adverse effect on the integrity of protected sites. There are significant gaps in evidence, internal inconsistencies, and methodological weaknesses that undermine the reliability of the ornithological assessment. The assessment fails to adequately evaluate the implications of displacement, collision risk, and habitat loss for internationally important seabird populations on the west coast of the Isle of Lewis, many of which are

already in decline. The application suggests that no significant adverse effects are anticipated, yet it simultaneously puts forward a Habitats Regulations derogation case, which implies that significant harm is expected. This contradiction raises serious concerns about the validity of the assessment's conclusions.

Furthermore, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will not be adversely impacted. The significance of these feeding grounds is not fully considered, and the reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are experiencing severe declines. The methodologies used are likely to underestimate potential mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

The siting of turbines in a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier within a primary flight path for 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 been considered.

Collectively, these deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. The overall conclusion is that the assessment is unreliable due to its internal inconsistencies and insufficient evidence, which prevents a thorough evaluation of impacts and indicates that the application does not meet the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment represents a material omission within the application and undermines the competent authority's ability to conduct a robust socio-economic and health evaluation. This lack of transparency hampers the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at risk. Without access to the complete dataset, the application does not present a thorough evidential basis for weighing benefits against harm.

Evidence indicates that residents are experiencing stress, anxiety, and concern related to the scale and proximity of the proposal, reflecting direct engagement rather than speculation. However, the failure to publish the full assessment limits public scrutiny of these findings and obstructs the ability to evaluate their significance in the decision-making process.

Furthermore, there are indications that the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” being noted in the developer’s findings.

Despite these critical impacts, they have not been adequately incorporated into the main application or given the appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must promote positive health outcomes and mitigate harm, yet the current evidence suggests existing adverse effects that have not been fully revealed. The absence of the complete assessment prevents any demonstration of compliance with this policy.

Ultimately, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This deficiency obstructs lawful determination and reinforces the assertion that the application lacks sufficient information.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding the assessment of onshore infrastructure, which remains materially incomplete and fails to account for the comprehensive impacts of what constitutes a single integrated project. While the offshore turbines and onshore works are intrinsically linked, they are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Onshore components of the project involve cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure that traverses sensitive landscapes. Excavation across areas of deep peat, particularly within Barvas Moor—an important carbon store and ecologically sensitive habitat—has not been adequately assessed. The application does not provide a complete evaluation of these impacts, which hinders a full understanding of the project's overall environmental footprint.

By deferring or excluding the assessment of onshore impacts, the application fails to enable a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively. However, due to the separation of offshore and onshore elements, the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application does not demonstrate thorough assessment of impacts on these habitats or the implementation of appropriate avoidance measures. This creates a clear evidential gap concerning biodiversity protection.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not provide evidence that

the required consents or processes have been initiated, raising serious concerns about deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate protection for peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to illustrate 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 segment of the application both incomplete and unreliable, thus preventing a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a profound inadequacy in meeting the standards of sustainable development, as established by statutory duties and national policy. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. However, this application is now under a more rigorous policy framework, which places greater emphasis on biodiversity, peatland preservation, landscape integrity, and the well-being of communities.

A complete and trustworthy evidential foundation for determining this application is lacking. There are significant gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Moreover, crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, which hampers a thorough understanding of potential significant effects or residual impacts.

There are evident procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a notable omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community well-being, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal is in direct opposition to the National Planning Framework 4. It fails to illustrate the protection of biodiversity, natural landscapes, and cultural heritage, does not demonstrate that health and well-being impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. The assessments

concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and impacts on tourism are all permanent consequences that cannot be mitigated to an acceptable degree.

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

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

Additional Comments

I have family ties either the area and visit often. The scale of this is worrying and also the fact that the local community will not benefit from the power generated.

Yours faithfully,

[Redacted]

Member of the public 1660

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 is submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a review of the Environmental Impact Assessment Report along with the supporting documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and rich cultural identity, and concerns regarding its scale, proximity, and design raise important questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination, with critical environmental data missing and baseline information being limited and inconsistent. Additionally, many key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, and the absence of specified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Moreover, there are notable policy inconsistencies present. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned analysis of alternatives, which is essential for compliance with the statutory requirements of the Environmental Impact Assessment regime. Instead of a detailed comparison of feasible alternatives grounded in environmental considerations, the documentation offers merely a narrative of the project's development. This shortcoming indicates that less harmful options have not been thoroughly identified, evaluated, or selected over more detrimental solutions.

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

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

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

From a policy standpoint, this deficiency casts doubt on adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and does not warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to present a thorough assessment of marine ecology and protected species, resulting in a lack of a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. This area is noted for its high sensitivity and biological activity; however, the baseline data provided is incomplete, and the methodologies used do not adequately capture the presence,

behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant gap in the assessment concerns otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal regions for foraging and movement. The neglect of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts arising from construction disturbance, noise, and heightened activity. This oversight undermines the conclusions regarding the absence of significant effects on this species.

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

These methodological flaws result in findings of negligible or non-significant effects that are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these shortcomings precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development fails to meet the necessary evidential standards regarding the impact on ornithological factors, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. The application does not sufficiently demonstrate that these species will remain unaffected, despite being situated in key foraging areas and migratory pathways. There is a clear lack of robust evaluation regarding displacement, collision risk, or habitat loss, which raises concerns about the adequacy of the ornithological assessment.

There is a fundamental contradiction within the application, as the developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency undermines the reliability of the assessment and highlights the lack of support for its conclusions based on the available evidence.

Moreover, the assessment does not adequately address the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches introduces uncertainties, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional significant risk by creating a barrier along a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term implications of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory viewpoint, the application does not fulfil the evidential threshold needed to confirm no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, which prohibits a lawful conclusion in support of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development inadequately addresses the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A notable deficiency is evident in the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features, overlooking their continued use and meaning, as well as the potential impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their importance to community life.

Moreover, the application fails to acknowledge intangible cultural heritage, which encompasses the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity but have been completely omitted from the assessment, creating a significant gap in understanding the cultural impact of the development.

Concerns extend to community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity that aligns with characteristics of an Indigenous People; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural error is the absence of a compliant Island Communities Impact Assessment, mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, the inadequacies present in the proposal conflict directly with National Planning Framework 4, particularly concerning the protection of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the lack of recognition for living cultural practices, clearly deviates from established policy requirements.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and their implications for seascape and landscape quality is insufficient and fails to capture the true extent of change anticipated in the area. The character of the West Lewis coastline is characterised by an expansive Atlantic horizon, a largely undeveloped environment, and a profound sense of remoteness. The planned installation of large turbines near the shoreline would introduce a persistent industrial presence, fundamentally transforming this unique

landscape and resulting in an irreversible alteration of its character.

The proposal does not fully address the extent of the visual changes that would occur. Given their size and proximity, the turbines are likely to dominate views from nearby residential areas, historic sites, and frequently visited coastal spots. This dominance would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness associated with the area. The assessment inadequately conveys the significance of this impact in relation to the sensitivity of the surrounding landscape.

Methodological issues also arise concerning the choice and depiction of visual viewpoints. Evidence indicates that the selected viewpoints may not adequately represent the most sensitive receptors or the most severe scenarios, particularly concerning key cultural heritage sites and landscapes of high value. Such a shortcoming risks underestimating the visual impact, which jeopardises the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. The evaluation incorrectly treats these sites as standalone entities, disregarding their interrelationships, which leads to an incomplete analysis of their setting and cultural relevance.

The proposed industrialisation of the seascape threatens to disrupt these connections, altering how heritage assets are perceived and severing their ties to the natural horizon. This situation presents not merely a visual concern but extends to broader cultural and spatial detriments that the application fails to adequately consider.

From a policy standpoint, the proposal is at odds with the National Planning Framework 4 regarding the preservation of natural environments and historical assets. The scale of transformation proposed does not comply with the necessary protections for landscape character, visual amenity, and the settings of sites of cultural importance. The lack of a comprehensive worst-case scenario assessment further diminishes the credibility of the proposal's alignment with policy requirements.

Moreover, it is evident that the identified impacts cannot be satisfactorily mitigated. The size, height, and proximity of the turbines would result in a presence that is both dominant and unavoidable. Thus, the anticipated changes are foundational and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings undermine the ability to conduct a reliable evaluation and

reinforce the assertion that the proposal is incompatible with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal does not adequately assess construction and pollution risks, lacking the detail needed to evaluate potential environmental effects. It involves significant seabed preparation and installation work in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that will be developed after consent, making it impossible to assess their effectiveness or adequacy meaningfully.

This approach is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application notes risks like sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient detail on prevention, control, or monitoring measures.

Furthermore, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without solid modelling and clearly defined management strategies, it is not feasible to ascertain the extent, duration, or ecological impacts of these issues. This uncertainty also pertains to potential effects on marine species and habitats identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the evaluation of whether adequate safeguards exist to address pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and a lawful determination cannot occur if such information is absent. The application also does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the failure to present defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These issues prevent a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise from construction activities. The use of high-energy hammer piling over an extended timeframe is anticipated to disturb marine life over large distances, with particular concern for species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises alarming questions, yet the application tends to minimise the importance of these effects, lacking sufficient supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a fragmented assessment that fails to consider the full impacts of what is essentially a single integrated project. The offshore turbines are directly linked to the onshore works, yet the separation in their evaluation obscures the true scale of the environmental and socio-economic effects.

Included in the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure that traverses sensitive landscapes. These constructions involve the excavation of deep peat, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. The application does not adequately assess these impacts, which hinders a complete understanding of the project's overall environmental footprint.

The failure to assess onshore impacts either thoroughly or at all prevents a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all project components must be considered collectively; however, by treating offshore and onshore elements as distinct, the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Sensitive habitats such as machair systems and peatland environments, which are subject to policy protection, face significant risks from this proposal. There is no evidence presented that these impacts have been fully considered or that appropriate avoidance measures have been implemented, leading to a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland could release stored carbon, creating a potential carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter nor does it demonstrate that the overall carbon balance will remain beneficial.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or procedures have been initiated, which raises serious questions about the feasibility and legal compliance of the implementation.

From a policy standpoint, the lack of a comprehensive assessment of the project, particularly regarding the protection of peatlands, habitats, and land use interests, is in conflict with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's reliability.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a concern. This new application is presented within a stronger policy framework that places significant emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determination is lacking, characterised by critical gaps in baseline data. The ongoing use of an undefined design envelope and reliance on unspecified mitigation measures further undermine its credibility. Additionally, important impact pathways, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism implications, have been omitted. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment contravenes the statutory duty established under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

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

Uncertain and potentially significant environmental risks are present. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based

decision. The competent authority must either refuse consent based on these grounds or employ the relevant regulatory provisions to obtain the missing information.

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

Yours faithfully,

[Redacted]

Member of the public 1661

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application fundamentally lacks the necessary clarity regarding its potential environmental impacts, leaving serious questions unanswered. The Environmental Impact Assessment Report fails to deliver a comprehensive and transparent evaluation of the proposal's likely environmental effects. A notable issue is the use of a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This uncertainty hampers the ability to apply a worst-case scenario consistently, thereby undermining the assessment's integrity. As a result, the impacts presented may not accurately represent the actual development, depriving both the public and the competent authority of a true understanding of the potential environmental consequences.

Moreover, the application is heavily dependent on mitigation measures, management plans, and monitoring strategies that remain undefined at this stage. Seeking consent under these conditions means that environmental harm will supposedly be addressed later, which renders any meaningful evaluation of effectiveness or assessment of residual impacts impossible. This procedural deferral of critical information contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

There are also severe evidential gaps that undermine the assessment. These include inadequacies in baseline data, methodological limitations, and reliance on unverified assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty about the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are asserted without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot comply with statutory requirements.

Consequently, the application does not meet the evidential threshold stipulated by the Habitats Regulations, failing to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully evaluated or that appropriate safeguards are established.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely deficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic perspective, reducing heritage to a collection of isolated, unchanging features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment inaccurately describes them as static entities, overlooking their ongoing significance, usage, and the development's effects on their surroundings. This misunderstanding results in an incomplete cultural evaluation and fails to account for their importance to community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These critical aspects of identity are entirely omitted, representing a substantial gap in the evaluation. Without acknowledging these factors, the true cultural impact of the proposed development cannot be fully grasped.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking population embodies a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement significantly undermines the assessment's credibility and fails to adhere to established participatory principles in cultural and environmental decision-making.

Additionally, there is a notable procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority is unable to meet its legal obligation to assess the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, clearly violates policy expectations.

In summary, the neglect to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory duties results in a substantial evidential void. The cultural ramifications of the development have not been properly examined, and the application fails to provide a solid foundation for assessing the genuine cultural cost of the proposal.

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, national policy, and evidential standards. This application revisits issues that led to the rejection of the Lewis Wind Power proposal in 2008, where unacceptable levels of industrialisation were identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a comprehensive or dependable evidential basis for evaluation.

Significant gaps exist in the baseline data, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures, as well as the omission of essential impact pathways including nocturnal wildlife, full onshore infrastructure, and tourism effects, renders the Environmental Impact Assessment incomplete. This lack of thoroughness inhibits a full understanding of the likely significant effects or residual impacts.

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

Additionally, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to show acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty around environmental risks remains considerable. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to 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, along with negative impacts on tourism, would result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The myriad of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The

competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

Our island prides itself on its natural beauty and wildlife which i feel will be directly impacted by this installation.

Yours faithfully,

[Redacted]

Member of the public 1662

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 regimes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies across various domains, including planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application does not present a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, important elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are significant and clear conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests required for consent and impair the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises considerable concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance suggests that the application is incomplete and unable to facilitate a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ASSESSMENT OF ALTERNATIVES

The proposed application exhibits significant shortcomings in the assessment of alternatives, failing to meet the statutory obligations of the Environmental Impact Assessment regime. It does not offer a structured and reasoned comparison of realistic alternatives based on their environmental impacts. Instead, it presents a narrative detailing the evolution of the project, which does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging alternatives.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not illustrate that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. This is particularly pertinent given the sensitivity of the West Lewis coastline and the critical role that distance from the shore plays in determining impact. The failure to provide such analysis obstructs any conclusion that the proposed location constitutes the least damaging choice.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance, coupled with the absence of comparative analysis, indicates that mitigation by design has not been effectively implemented, resulting in an overreliance on post-design mitigation measures.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority from ascertaining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal is sustainable or aligns with policy requirements.

From a policy viewpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community well-being. The absence of a structured and comparative assessment is a significant omission that reinforces the overall conclusion that the application has not been adequately evaluated and does not warrant a lawful determination.

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the

degree of industrialisation was deemed unacceptable. This current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify these concerns.

There are substantial deficiencies in the evidential basis for this application. It lacks complete and reliable baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Furthermore, key impact pathways, such as those relating to nocturnal wildlife, onshore infrastructure, and tourism effects, have not been addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

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

This proposal is also in direct violation of National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, nor does it validate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the proposed net economic benefits. Additionally, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are concerning and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, inconsistent. The evidence required to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, thus engaging the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

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

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

As an islander, who has chosen to remain on the island, post education, marry and invest on the island this development causes me great concern. I have worked within social care throughout my career, largely working with children and young people and their families, and the risks that this development poses to them seems not to be considered. Many individuals who have wealth and education have been able to voice their concerns and objections, but those whose lives are more vulnerable to the drastic change in socioeconomic culture that a development of this size have not been explored or protections put in place. The exploitative nature of this development is of great concern. The influx of specialist workers whose hundreds of properties are currently being developed for, with whom no care and respect for those residing on the island prior but for consumption of resources and people. It is feared and expected that drug and alcohol use will increase, and as experienced previously on the Isle of Lewis during other developments along with sexual and physical assaults.
I am from the west side of the island and am passionate about my spirituality, and the historic spiritual grounds which this development, in particular Barvas which this development will harm is without comprehension.

Yours faithfully,

[Redacted]

Member of the public 1663

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment regimes. The proposal raises serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles. It is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks an adequate evidential basis for lawful determination, as it omits critical environmental data, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures an understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. This results in documentation that fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are also substantial policy conflicts to address. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this region, with large turbines positioned close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and does not support a lawful determination. In light of these issues, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to a materially inadequate assessment of alternatives. Instead of providing a well-structured and reasoned comparison of realistic alternatives based on environmental effects, it offers a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

The assessment lacks a transparent and evidence-based comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, an action that could potentially reduce visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the significance of proximity to shore in determining impact highlight the inadequacies in this analysis, preventing any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies are evident in cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, indicates a failure to apply mitigation by design, relying instead on post-design mitigation measures.

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

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not been thoroughly evaluated and cannot sustain a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented regarding cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of acknowledging the ongoing social, cultural, and spiritual roles that heritage plays within the community, the application adopts a reductive viewpoint, treating heritage as isolated and static assets.

A significant shortcoming is evident in the handling of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are incorrectly classified as static features in the assessment. This oversight ignores their ongoing usage, significance, and the potential impact of development on their surroundings. Such mischaracterisation results in an incomplete understanding of cultural effects and dismisses their importance to community life.

Moreover, the assessment neglects intangible cultural heritage elements such as the Gaelic language, local traditions, and the historical bond between the community and the coastal environment. These aspects are pivotal to the area's identity but are entirely omitted from the assessment, leading to a critical deficiency. Without addressing these components, the development's cultural impact remains inadequately understood.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People; however, the lack of a process for Free, Prior and Informed Consent calls into question the legitimacy of the assessment. This failure to engage meaningfully undermines established principles of participation in decisions that affect cultural and environmental interests.

A notable procedural failing is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, the identified deficiencies contradict the National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the combined failure to assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a sufficient foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is seriously inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped nature that contributes to a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would establish a continuous and overpowering industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately represent the extent of visual alteration expected from the project. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the inherent qualities of naturalness and remoteness. Moreover, the assessment does not sufficiently convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints, as evidence indicates that these may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This may result in an understatement of the magnitude of visual impact, which compromises the overall reliability of the assessment.

Additionally, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded in a broader landscape framework, visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these assets in isolation, failing to recognise their interdependence, which leads to a partial understanding of the impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This results in not only a visual impact but also a deeper cultural and spatial damage that has not been adequately assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the safeguarding of natural areas and historic assets. The scale of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any argument for 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 overwhelming and unavoidable. Consequently, the change would be fundamental and permanent, not amenable to reduction 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 interconnected relationship between landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is incompatible with the protection of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits serious deficiencies that compromise its compliance with sustainable development criteria as mandated by statutory duties, national policy, and evidential standards. Similar issues that led to the rejection of the Lewis Wind Power proposal in 2008 are apparent, as the current application presents a level of industrialisation that remains unacceptable despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis necessary for a sound determination of

the application. The use of an undefined design envelope is problematic, and there is a lack of specified mitigation measures. Furthermore, the application omits critical impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission that inhibits the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The absence of tourism impact modelling fails to provide evidence of any net economic benefit. Moreover, there has been insufficient assessment of the cumulative impact from both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. This lack of thorough investigation, and instances of internal inconsistency, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, thereby hindering the capacity to lawfully conclude that impacts are acceptable.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1EFAB6F8

Member of the public 1664

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. The basis for this objection stems from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key components of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

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

The scale of the proposed development is unprecedented for this location, with large turbines positioned near the shoreline, raising significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and fails to deliver a complete, transparent, or dependable account of the likely environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates a substantial level of uncertainty. This lack of clarity undermines the assessment's integrity, making it impossible to consistently apply a worst-case scenario. Consequently, the impacts outlined may not accurately represent the final development, hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be addressed later, it becomes impossible to conduct a meaningful evaluation of the effectiveness of these measures or to assess any residual impacts. This postponement of essential information to post-consent phases is procedurally inappropriate and contradicts the core purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established prior to decision-making.

Additionally, there are marked evidential deficiencies, including inadequate baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues result in uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust data to support them. The lack of adequate information hampers 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 satisfy the evidential threshold stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects, meaning that the competent authority lacks the necessary information to make a sound determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough and transparent assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic alternatives based on their

environmental impacts, it provides a narrative of project evolution that does not adequately demonstrate that less harmful options have been identified or selected over more damaging solutions.

In particular, there is no evidence of a proper evaluation of alternative offshore locations, development scales, or design configurations. The absence of an analysis regarding the potential to locate turbines further offshore is especially concerning, as this could significantly reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining environmental impact, the lack of such assessment prevents a conclusion that the proposed siting is the least damaging option available.

These inadequacies extend to the routing of cables and the assessment of landfall, where there is insufficient exploration of alternative routes to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear strategy for avoidance, combined with a lack of comparative analysis, indicates that the application has not effectively applied mitigation by design, instead relying on post-design measures.

As a consequence, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy, leaving the competent authority unable to determine whether less harmful and more suitable alternatives exist. Without a robust assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with policy.

From a policy perspective, this lack of structured assessment undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to provide a comprehensive and comparative analysis is a significant omission that contributes to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is critically flawed and fails to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data presented is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of the species within it. Consequently, the assessment lacks a solid evidential basis for impact evaluation.

A significant oversight is the inadequate recognition of otters, which are a European Protected Species, as the application does not properly evaluate their use of coastal areas for foraging and movement. The failure to assess their core foraging range and behavioural patterns means that the potential impacts of construction disturbance,

noise, and increased activity remain unexamined. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Moreover, there are further shortcomings 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 when compared to established land-based observations that indicate frequent utilisation of these waters. The omission of such relevant data contributes to an incomplete baseline, thereby undermining the reliability of the conclusions reached.

These methodological flaws mean that claims of negligible or non-significant effects are based on assumptions rather than sound evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty regarding the actual scale of risk to marine species and habitats necessitates immediate attention.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as the identification and assessment of protected species are inadequate. The degree of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape, where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, adopting a reductive approach that treats heritage as a series of isolated, static assets. This failure to acknowledge the ongoing social, cultural, and spiritual functions of these elements within the community is a critical oversight.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas represent active places of burial and spiritual practice. Yet, the assessment inaccurately categorises them as static features, neglecting their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects, disregarding their essential role in community life.

Moreover, the assessment does not consider intangible cultural heritage, which includes 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, marking a significant omission that prevents a proper understanding of the cultural impact of the development.

Community rights and engagement further exacerbate the situation. The Gaelic-speaking population possesses a distinct cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, which is a significant omission that prevents lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, and to recognise living cultural practices, clearly departs from policy requirements.

Collectively, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is significantly lacking and does not provide the transparency necessary for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the full report remains unpublished. This creates a serious evidential gap, making it impossible for both the public and the competent authority to grasp the full extent of the social risks highlighted by the developer's own research.

Summaries that are available suggest that residents are already experiencing significant stress, anxiety, and concern due to the scale and proximity of the proposal. These effects are based on direct engagement rather than speculation. However, the absence of the complete assessment hinders a thorough examination of these findings and restricts the ability to ascertain their importance in the decision-making process.

There is also an indication that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” mentioned in the developer’s own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given proper consideration. Withholding the full Social Impact Assessment clouds the actual human and social costs associated with the

development.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and minimise harm, yet existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be established.

The procedural implications are substantial. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline poses a significant threat, as this would create a continuous industrial presence that fundamentally alters the unique character of this landscape. Such a transformation would be permanent and irreversible, fundamentally changing the views and experiences of the area.

Concerns arise regarding the assessment of visual impacts, which fails to accurately reflect the scale of the changes anticipated. The turbines' size and proximity would dominate views from residential areas, historic sites, and popular coastal locations, severely impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of these impacts in a sensitive landscape, leading to an inadequate understanding of the transformation that would occur.

Methodological issues are apparent in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not encompass the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the

magnitude of visual impact has been understated, which undermines the credibility of the assessment.

Moreover, there is a notable failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape that connects visually and spatially to the Atlantic horizon. The assessment treats these sites in isolation, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their ties to the natural horizon. This issue extends beyond mere visual impacts, encompassing a wider cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a comprehensive worst-case assessment diminishes any claims of policy compliance.

Ultimately, the identified impacts cannot be effectively mitigated. Given the turbines' size, height, and proximity, their presence would be both dominant and unavoidable. The resulting alterations would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

In summary, the assessment falls short in accurately representing the scale of the impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

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 fundamentally flawed due to the absence of any evaluation regarding dark skies and nocturnal wildlife. The West Lewis coastline is known for its exceptionally dark skies, which are vital to environmental quality, cultural identity, and tourism, particularly in emerging sectors such as astro-tourism. The proposal includes permanent red aviation lighting that would create a continuous “wall of light” effect across the western horizon, fundamentally changing the night-time environment and impacting visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is significant, given the importance of dark skies to the area’s identity.

The application fails to assess the consequences of this artificial lighting on nocturnal wildlife, which is a critical oversight. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to such lighting due to phototaxis, which can result in disorientation and increased collision risk. No lighting impact assessment or phototaxis study has been provided, meaning the potential effects on these species and the associated risk of increased mortality have not been evaluated.

Additionally, the ornithological assessment relies solely on daytime survey data, neglecting to capture nocturnal activities or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this concern has not been addressed. The absence of specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

Moreover, this oversight contradicts the 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 night-time character is an integral aspect of the environment. Collectively, the lack of evaluation concerning dark skies and nocturnal wildlife creates a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and inadequate for a lawful determination.

SUMMARY

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

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

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

The proposal contradicts National Planning Framework 4. It does not demonstrate

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

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

The deficiencies in the Spiorad na Mara Environmental Impact Assessment mirror the legal failings identified by the Inner House in Raeshaw Farms Ltd v Scottish Ministers [2026] CSIH 10, where the decision maker failed to assess whether the wind farm and its grid connection constituted a single project for EIA purposes. The Court held that the reporter had not carried out the required “reasoned and fact specific” evaluation of whether the grid connection and turbines formed one project, and emphasised that assessing only part of a development results in an unlawful EIA.

The same legal flaw arises here. The Spiorad na Mara EIAR excludes the full cumulative impacts of the offshore array, the onshore grid infrastructure, and the wider transmission upgrades that the project depends upon. This is directly analogous to the unlawful “project splitting” criticised in Raeshaw, where the Court confirmed that connected elements must be assessed together where they are functionally interdependent.

The Inner House also held that it was irrational for the reporter in Raeshaw to take into

account the benefits of a fully connected wind farm while ignoring the environmental harms of the grid connection. The same irrationality arises in the Spiorad na Mara application, which promotes the benefits of offshore generation while omitting the environmental costs of the required transmission infrastructure across Lewis and the wider Highlands. This renders the EIA incomplete and therefore incapable of supporting a lawful consent

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The proposal also conflicts with the United Kingdom's obligations under the European Landscape Convention (2000), which the UK ratified in 2006. The Convention requires public authorities to recognise landscape as "an essential component of people's surroundings and quality of life" and to protect it through transparent, participatory decision making. The removal of the natural horizon line constitutes "a fundamental alteration of landscape character" and is therefore incompatible with the Convention's requirement to safeguard landscape integrity. The visualisations provided in the EIA demonstrate an industrialisation of the seascape that is wholly inconsistent with the Convention's principles, which apply equally to coastal and marine landscapes.

The failure to assess reasonable alternatives—including alternative siting further offshore beyond the visual horizon, undergrounding of associated cabling, or offshore routing of transmission infrastructure—renders the application procedurally deficient. The EIA omits any meaningful assessment of "undergrounding cables… offshoring subsea connections rather onshore transmission… [or] alternative routing or tower design," despite Schedule 4, Paragraph 4 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 requiring a description of reasonable alternatives. This omission is legally significant. In Uplift v Secretary of State for Energy Security and Net Zero [2023] EWHC 2622, the High Court confirmed that alternatives must be assessed where they are technically and environmentally relevant. The absence of such assessment in this case undermines the lawfulness of the EIA and prevents the Scottish Ministers from reaching a rational or informed decision.

The cumulative impact of this development cannot be considered in isolation. The associated grid infrastructure—including transmission lines, substations, and onshore corridors—forms part of a wider network designed to facilitate multiple large scale energy projects. The EIA fails to assess "the cumulative lifecycle carbon impacts of these linked developments" or the "carbon lock in effect" created by enabling infrastructure. This omission breaches Schedule 4, Paragraph 6 of the 2017 EIA Regulations and contradicts the precautionary principle affirmed in McGinty v Scottish Ministers [2010] CSOH 5, which requires decision makers to act cautiously where scientific uncertainty exists. Approving this application would therefore set a precedent for further cumulative industrialisation of the Outer Hebrides marine environment without any lawful cumulative assessment.

The precedent created by consenting Spiorad na Mara would be profound. Once an industrial horizon is introduced into an area of outstanding natural beauty, it becomes materially easier for future developers to argue that the landscape is already compromised. This risk was recognised in Wildland Ltd v Scottish Ministers [2019] CSIH 29, where the Inner House

emphasised the need to protect wild land from incremental and cumulative industrialisation. The Court held that decision makers must consider not only the immediate impact of a proposal but also the long term consequences of permitting industrial development in sensitive landscapes. The same principle applies here: granting consent would open the door to further offshore and onshore infrastructure, fundamentally altering the character of the west Lewis coastline.

The destruction of the natural horizon line and the industrialisation of the seascape would also have severe consequences for the island's tourism economy. The removal of the visual horizon is "not a minor visual intrusion but a fundamental alteration of landscape character." The European Landscape Convention recognises landscape as a resource for economic activity, including tourism. Scotland's own National Marine Plan (para. 12.28) similarly acknowledges that scenery and environmental quality are key drivers of coastal tourism. The failure to assess the long term economic harm to tourism—particularly in an island economy where landscape is the primary asset—renders the EIA incomplete and contrary to Schedule 4, Paragraph 8 of the 2017 Regulations, which require assessment of population and human health, including wellbeing and amenity.

Finally, the Crown Estate's decision to lease the N4 seabed without prior public consultation is inconsistent with both domestic and international legal obligations. The Aarhus Convention requires "early and effective involvement of the public in decisions regarding specific projects... [and] broader environmental programmes and strategies." The leasing of seabed for industrial development is unquestionably a strategic environmental decision. Case law such as Uprichard v Scottish Ministers [2013] UKSC 21 and Walton v Scottish Ministers [2012] UKSC 44 confirms that public participation is a fundamental component of lawful environmental governance and that individuals have standing to challenge decisions that affect their environment. By auctioning the seabed before any community engagement, Crown Estate Scotland acted contrary to these principles and undermined the procedural fairness required by the Environmental Assessment (Scotland) Act 2005, which mandates consultation on plans and programmes likely to have significant environmental effects

Yours faithfully,

[Redacted]

Member of the public 1665

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 frameworks. It arises from an examination of the Environmental Impact Assessment Report and accompanying documents, revealing significant shortcomings in planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the western side of the Isle of Lewis, an area noted for its Atlantic-facing coast, near-pristine surroundings, and strong cultural significance. Concerns regarding the scale, proximity, and design of the project fundamentally challenge its adherence to statutory obligations, national policies, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful determination. There are gaps in critical environmental data, with baseline information being both limited and inconsistent, while vital elements of the proposal remain undefined. The application's flexible design framework obscures a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders their efficacy unassessable. Consequently, the documentation fails to provide a thorough understanding of potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust support.

The proposal also presents clear and serious conflicts with policy. It appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and community health and wellbeing. It does not convincingly demonstrate compliance with national mandates for protecting biodiversity, climate considerations, and overall environmental integrity. These discrepancies challenge the statutory requirements necessary for consent and hinder the competent authority's capacity to determine the development's policy acceptability.

Moreover, the proposal's scale is unprecedented for this area, with large turbines planned in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental consequences. The combination of inadequate information, reliance on undefined mitigation strategies, evidential deficiencies, and evident policy non-compliance renders the application incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential transparency and reliability in its account of the likely environmental effects associated with the proposal. It employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, leading to considerable uncertainty. This lack of certainty compromises the integrity of the assessment and obscures the actual environmental impacts that may arise from the development. As a result, both the public and the competent authority are left without a clear understanding of the true extent of these effects.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application is seriously flawed in its assessment of marine ecology and protected species, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its

sensitivity and biological activity, yet the baseline data presented is insufficient. The methodologies employed do not effectively capture key aspects such as species presence, behaviour, and habitat use, undermining the assessment's ability to evaluate potential impacts accurately.

One significant oversight involves otters, classified as a European Protected Species. The application fails to adequately recognise and evaluate the otters' active use of coastal regions for foraging and movement. By not considering their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased activity have not been thoroughly examined. This deficiency raises questions about the validity of conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is compromised by the use of aerial surveys, which introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest these waters are frequently used by basking sharks. The failure to incorporate or adequately consider such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including variations by season and broader ecosystem interactions. This creates uncertainty about the actual risks facing 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, given that protected species have not been appropriately identified or assessed. The resulting uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding the reliability of the ornithological assessment, which is riddled with substantial gaps in evidence and internal contradictions that fundamentally undermine its conclusions. The site is situated on the west coast of the Isle of Lewis, an area known to support internationally

important seabird populations that are already in decline. However, the application does not adequately demonstrate, to the requisite evidential standard, that these species will remain unaffected. Key foraging areas and migratory pathways are located within the development site, yet the assessment fails to thoroughly evaluate the implications of habitat loss, collision risk, and displacement.

Moreover, a critical inconsistency is evident in the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment, suggesting that its conclusions are not substantiated by the evidence provided. The assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully acknowledged, and reliance on modelling methods introduces further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially where baseline data is incomplete and the behavioural responses of the birds remain poorly understood.

Placing turbines within a recognised migratory corridor adds another layer of significant risk, potentially creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application inadequately considers the long-term consequences of ongoing mortality in this corridor, along with the potential impact on species with relatively small global populations.

Regulatory compliance is also called into question, as 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, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, impeding any lawful conclusions that could support consent.

The identified deficiencies also demonstrate a lack of compliance with National Planning Framework 4, particularly concerning biodiversity protection and the conservation of natural assets. The inability to convincingly show that internationally significant seabird populations will not be adversely affected positions the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological flaws, and inadequate evidence. These issues hinder a thorough evaluation of potential impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for a favourable decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely deficient, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape

where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, treating heritage as isolated and unchanging assets, rather than acknowledging their continuing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment mistakenly categorises them as static features, failing to take into account their ongoing use, significance, and the implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and disregards the cemeteries' integral role in community life.

Moreover, the assessment lacks a consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These components are crucial to the area's identity but are entirely omitted from the evaluation, representing a significant oversight. The absence of these factors hinders a proper understanding of the cultural impact of the proposed development.

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

A fundamental procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission is sufficient to preclude a lawful determination.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential void. The cultural impacts of the development have not been adequately evaluated, and the application lacks a robust foundation for ascertaining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment raises serious concerns regarding its adequacy and legality. Although the developer engaged local residents through focus groups, the comprehensive report remains unpublished, creating a significant evidential gap. This omission obstructs the public and the competent authority from grasping the full scope of social risks highlighted by the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts stem from actual engagement rather than speculation. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, thereby hindering the determination of their relevance within the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own investigations. Yet, these social impacts have not been adequately addressed in the main application, nor have they been afforded the necessary consideration. The withholding of the entire Social Impact Assessment conceals the genuine human and social cost associated with the development.

This situation critically undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality are potentially affected. By failing to disclose the complete dataset, the application lacks a comprehensive evidential foundation for weighing benefits against harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid negative impacts, yet the available evidence indicates existing adverse effects that have not been transparently reported. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a critical omission within the application and demonstrates a failure to meet the evidential standards of the Environmental Impact Assessment framework.

Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not substantiated by adequate information.

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 assessment regarding construction and pollution risks is fundamentally lacking and fails to deliver the necessary detail for a proper evaluation of potential environmental effects. The proposal entails significant seabed preparation and

installation work in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises serious concerns due to the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application acknowledges the risks of sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on strategies for prevention, control, or monitoring of these events.

There is also ambiguity regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the assessment of whether adequate safeguards are in place to address pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to evaluate environmental protection measures at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed before consent is granted, and without this crucial information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy obligations concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is not complete and does not adequately consider the impacts of this integrated project. The offshore turbines and the onshore works are interconnected, yet they are evaluated separately, leading to a disjointed approach that hides the true scale of environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, a substation near

Stornoway, and access infrastructure through sensitive landscapes. These constructions involve excavating deep peat areas, particularly in Barvas Moor, which is crucial for carbon storage and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all components of a project to be evaluated together, but the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully appreciated.

There are notable risks to sensitive habitats, including machair systems and peatland areas that have policy protection. The application does not prove that the impacts on these habitats have been properly assessed or that suitable avoidance measures have been implemented. This creates a significant gap in evidence regarding biodiversity protection.

The proposal also raises issues related to carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt, contradicting renewable energy goals. The application does not sufficiently address this concern or show 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 fails to provide evidence that necessary consents or processes have been started, which raises doubts about its deliverability and lawful execution.

From a policy standpoint, the failure to assess the project as a unified whole and to ensure 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 weakens the application further.

Overall, the separation of project components, the lack of comprehensive assessment, and insufficient evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, preventing a lawful determination.

TOURISM

The tourism assessment presented in this application is fundamentally inadequate, failing to consider the economic and social ramifications for a critical sector of the Isle of Lewis economy. With tourism heavily reliant on the area's wild coastline, pristine landscapes, dark skies, and a sense of remoteness, this oversight is alarming. Although the application indicates that 86% of visitors are attracted by the scenery, it lacks a detailed evaluation of how large-scale offshore infrastructure might impact visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen remarkable 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 does not take into account how the industrialisation of the seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the overall resilience of the economy. Without a thorough analysis, it remains unclear if the proposed development would provide a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, particularly regarding unspoiled landscapes and dark skies, which are essential to enhancing visitor experiences. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a critical gap in understanding the implications for an increasingly recognised and vital aspect of the local economy, such as nature-based and astro-tourism.

Given the limited economic diversification of the island community, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been sufficiently evaluated, contrary to requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the need to prove a net benefit. It also stands in conflict with strategic goals that highlight tourism as a key growth sector and does not supply adequate evidence for the competent authority to assess the economic consequences of the proposal.

All these factors combined reveal a significant evidential gap due to the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic reliance on tourism. This lack of thorough evaluation hinders a comprehensive understanding of the economic effects and underscores that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as mandated by statutory duties, national policy, and evidential standards. It echoes the same principal concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extensive industrialisation proposed was deemed unacceptable. Although presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not provide a thorough or reliable evidential foundation for decision-making.

There are notable deficiencies in baseline data, and the application relies on a vaguely defined design envelope. It also depends on unspecified mitigation measures and neglects critical impact pathways, including the effects on nocturnal wildlife, full

onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a complete understanding of significant likely effects or residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory requirements under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal also contradicts National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, fails to assure that health and wellbeing impacts are acceptable, and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, leaving obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially grave. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unsuitable for determination. The abundance of information gaps, policy discrepancies, and unresolved environmental risks precludes a lawful, evidence-based decision. The competent authority must either deny consent on these grounds or exercise the relevant regulatory provisions to request the missing information.

Thus, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

I am a resident of the Isle of Lewis and strongly object to the proposed Spiorad na Mara development. I believe a project of this scale would fundamentally and permanently change the character of the island and surrounding seas.

One of the main reasons people choose to live in and visit Lewis is because of its natural beauty, open seascapes, quiet environment and strong sense of community. I

believe this development would industrialise a large area of coastline and sea around the island and damage the unique landscape and identity of Lewis.

I am also deeply concerned about the impact on local fishing activity and marine life around the island. Fishing has always been an important part of island life and economy, and I do not believe the long-term impacts on fishing grounds, marine ecosystems and navigation have been fully understood.

In addition, I do not believe the island infrastructure has the capacity to absorb a large influx of workers and associated activity. Ferry services and flights are already heavily oversubscribed during much of the year, and accommodation on the island is already under significant pressure. I am concerned this project would place further strain on transport links, housing and local services, affecting the daily lives of residents.

Overall, I believe the long-term negative impacts on the environment, community, landscape and quality of life outweigh any potential benefits of this proposal. I respectfully ask that these concerns are fully considered.

Yours faithfully,

[Redacted]

Member of the public 1666

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It is informed by a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal raises serious concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application is deficient in providing an adequate evidential basis for a lawful determination. It lacks critical environmental data, presents limited and inconsistent baseline information, and leaves key aspects of the proposal undefined. The employment of a flexible design framework obscures understanding of potential significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive or informed assessment of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal presents clear and substantial conflicts with existing policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, undermining the ability of the competent authority to determine the acceptability of the development from a policy perspective.

The scale of the proposal is unprecedented for this area, with large turbines proposed in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a complete and transparent account of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This variability undermines the integrity of the assessment and means that the impacts outlined may not accurately reflect the final development. Consequently, both the public and the competent authority are left without a clear understanding of the actual environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later impedes any substantial evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures be clearly established before a decision is made.

Significant evidential gaps persist, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate uncertainty about the magnitude and significance of impacts, especially where conclusions regarding negligible or non-significant effects lack robust supporting data. The failure to provide adequate information hinders a proper understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory obligations.

As a result, the application does not fulfil the evidential requirements set by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation, and the inadequacies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment conducted regarding marine ecology and protected species demonstrates significant deficiencies and fails to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically active marine system.

However, the baseline data collected is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat usage. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

Notably, the application omits crucial information related to otters, which are classified as a European Protected Species. It does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns undermines any conclusions drawn regarding the potential effects of construction disturbance, noise, and increased activity, leading to an inadequate assessment of significant effects on this species.

Furthermore, the evaluation of basking sharks is similarly flawed. The reliance on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions, which is likely to result in an underestimation of their presence. This issue is particularly pronounced when compared to established land-based observations that indicate frequent usage of these waters. The omission of such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings imply that conclusions asserting negligible or non-significant effects are based more on assumptions rather than robust evidence. The lack of sufficient baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed the protected species involved. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these circumstances, the granting of consent cannot be deemed lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, ultimately leading to the overall determination that the application does not possess a sufficient evidential foundation.

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 entails significant seabed preparation and installation activities within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail necessary to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are intended to be established after consent is granted, which impedes any meaningful evaluation of their adequacy or effectiveness.

This dependence on undefined future measures raises serious concerns, especially in

light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in providing adequate details on prevention, control, or monitoring strategies.

Additionally, there is uncertainty regarding the extent and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the ability to evaluate whether proper safeguards are in place to manage pollution events, introducing procedural risks that undermine the competent authority's capacity to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed before consent is granted, and the absence of such information renders a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In conclusion, the combined absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts lead to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application under consideration presents a significant concern regarding the assessment of fisheries and marine life, which is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine ecosystem and support an active fishing industry; however, the proposal does not provide evidence that these essential uses and habitats can be preserved or maintained without notable disruption.

A critical shortcoming lies in the presumption that fishing activities can be displaced without repercussions. The application fails to substantiate claims that there are alternative fishing grounds available, accessible, and able to accommodate any additional pressure. This lack of evidence is crucial, as displacement of fishing efforts could lead to overfishing in other areas and create broader economic ramifications for

the local fishing fleet. Consequently, without a well-supported assessment, the potential impacts on fisheries and the livelihoods dependent upon them remain inadequately understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over extended durations is expected to disturb marine life over extensive distances, including species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application diminishes the importance of these potential effects without providing sufficient evidence.

Inconsistencies within the application further exacerbate concerns. While there is an acknowledgment of the necessity for licenses to permit harm to European Protected Species, the impacts are concurrently described as negligible. This contradiction not only undermines the credibility of the assessment but also raises doubts about compliance with the Habitats Regulations, especially in instances where anticipated harm would require legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. An absence of a comprehensive evaluation regarding these cumulative effects hinders the ability to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It falls short of showing that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

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

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.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its ability to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. It is presented now under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

The evidential basis for the proposal is both incomplete and unreliable. There are significant gaps in baseline data, and it relies on an undefined design envelope along

with unspecified mitigation measures. Key impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism, are missing. As a result, the Environmental Impact Assessment fails to provide a complete understanding of likely significant effects or any residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings inhibit the competent authority from evaluating the potential impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct opposition to National Planning Framework 4. It fails to adequately protect biodiversity, natural areas, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of any net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the impacts on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties and potentially significant environmental risks associated with the proposal. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

This 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 negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, coupled with conflicts with policy and unresolved environmental risks, hinder any lawful, evidence-based decision-making. The competent authority must refuse consent on these grounds or activate the necessary regulatory provisions to obtain the missing information.

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

Yours faithfully,

[Redacted]

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9A172B36

Member of the public 1667

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 applicable marine licensing and Environmental Impact Assessment regimes. Upon reviewing the Environmental Impact Assessment Report and its accompanying documentation, several deficiencies have been identified that relate to planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. There are significant concerns regarding the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficiently evidential basis to facilitate a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined, which hinders a thorough understanding of the likely significant effects. The reliance on a flexible design framework and unspecified mitigation measures prevents the assessment of their effectiveness, leading to an incomplete picture of the potential environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust evidential support.

There are also significant policy conflicts evident within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly in terms of biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they undermine the ability of the competent authority to ascertain that the development aligns with policy objectives.

The scale of the proposed wind farm is unprecedented for this area, with large turbines positioned in proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and overall environmental impact. In summary, the lack of sufficient information, reliance on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance collectively indicate that the application is incomplete and fails to support a lawful determination. In light of these issues, it is essential that the precautionary principle is applied.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Moreover, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, these effects have not been adequately incorporated into the main application, nor have they been given appropriate weight. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning may be affected. By not providing the complete dataset, the application fails to offer a robust evidential basis to evaluate the balance between benefits and harms.

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

The procedural implications are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, paired with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the conclusion that the application does not possess sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The introduction of large-scale turbines

near the shoreline would result in a continuous industrial presence, fundamentally altering the landscape and leading to a permanent transformation of its character. The assessment of visual, seascape, and landscape impacts is significantly deficient, failing to accurately reflect the extent of change or the sensitivity of the surrounding environment.

The application does not sufficiently convey the magnitude of visual alteration. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact is not properly articulated within the assessment, nor is its significance considered in the context of such a sensitive landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This deficiency risks underestimating the magnitude of visual impact, thereby compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected nature of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, changing the context in which heritage assets are perceived and disrupting their connection to the natural horizon. This represents a visual impact, alongside broader cultural and spatial harm that has not been adequately examined within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural environments and historic assets. The scale of change proposed is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further undermines any assertion of compliance with relevant policies.

It is evident that the impacts identified are not capable of effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominating and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage.

These shortcomings inhibit a reliable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and significant habitats that are at risk of sediment disturbance and contamination. The assessment of construction and pollution risks presented in the application is deficient, lacking the necessary detail to adequately evaluate potential environmental effects. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment. However, it fails to include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent is granted, which precludes any substantial assessment of their adequacy or effectiveness.

The application acknowledges the risks of sediment mobilisation and the possibility of accidental chemical or oil spills, yet it does not sufficiently explain how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a stage following consent, the application obstructs the evaluation of whether suitable safeguards are established to manage pollution events. This introduces procedural risks and hampers the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to granting consent, and the absence of such information renders a lawful determination unfeasible. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in a materially deficient assessment. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents significant shortcomings in meeting the principles of sustainable development when evaluated against national policy, statutory obligations, and evidential benchmarks. This application mirrors the main concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, highlighting unacceptable levels of industrialisation. This current proposal is put forth under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

The evidential foundation for the application is incomplete and unreliable. There are notable deficiencies in baseline data, an unclear design envelope, unspecified mitigation measures, and key impact pathways that have not been addressed, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment fails to provide a thorough understanding of potential significant effects or residual impacts.

Procedural errors are also evident. The lack of a compliant Island Communities Impact Assessment violates the statutory requirements set out in the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment is a significant flaw. These gaps hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts with the National Planning Framework 4. It does not adequately ensure the protection of biodiversity, natural sites, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. Additionally, it lacks evidence of a net economic benefit, particularly due to the absence of tourism impact assessments. The assessment of cumulative impacts from both offshore and onshore components is inadequate, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent. The necessary evidential threshold to affirm the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and thereby precluding a lawful determination that impacts are acceptable.

Additionally, the proposal would cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and adverse effects on tourism represent permanent changes that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

I would hate to think that our current uninterrupted view of the Atlantic Ocean would be so spoilt with the plans of building these massive unattractive turbines. What an eyesore to our beautiful islands sea views. Also not just the turbines out at sea but what about the power stations that need to be built? Another eyesore for us...

I'm also very curious as to the long term benefit this will bring to us as islanders? Are we going to be better off from these turbines? Who are the financial winners going to be?

Yours faithfully,

[Redacted]

Member of the public 1668

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

Dear Sir/Madam

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

Crucially, the application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, with baseline information that is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The application employs a flexible design framework that obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

There are evident and serious policy conflicts. The proposal appears to be at odds 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 sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts directly challenge the statutory tests needed for consent, undermining the ability of the competent authority to deem the development acceptable in policy terms.

Additionally, 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 overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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 fails to provide a structured and reasoned comparison of realistic alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of thoroughly assessing potential options based on their environmental effects, it presents a narrative that outlines the project's evolution. This lack of rigorous analysis means that less harmful alternatives have not been properly identified or selected over more damaging options.

Furthermore, there is an absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has adequately considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. Given the delicate nature of the West Lewis coastline, and the importance of proximity to the shore in determining impacts, this oversight undermines the validity of the proposed siting as the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is insufficient evidence of exploration of alternative routes that could avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, with an overreliance on post-design mitigation measures.

As a result, the application does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their active utilisation of coastal areas for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of 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 renders the assessment unreliable. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

understood.

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

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

In addition, the identified deficiencies constitute a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely deficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic perspective, reducing heritage to a collection of isolated, unchanging features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment inaccurately describes them as static entities, overlooking their ongoing significance, usage, and the development's effects on their surroundings. This misunderstanding results in an incomplete cultural evaluation and fails to account for their importance to community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These critical aspects of identity are entirely omitted, representing a substantial gap in the evaluation. Without acknowledging these factors, the true cultural impact of the proposed development cannot be fully grasped.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking population embodies a unique cultural identity akin to that of Indigenous Peoples, yet

there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement significantly undermines the assessment's credibility and fails to adhere to established participatory principles in cultural and environmental decision-making.

Additionally, there is a notable procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority is unable to meet its legal obligation to assess the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, clearly violates policy expectations.

In summary, the neglect to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory duties results in a substantial evidential void. The cultural ramifications of the development have not been properly examined, and the application fails to provide a solid foundation for assessing the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This lack of transparency undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health impacts is crucial for

developments of this magnitude, especially when they may affect community character and functioning. By not providing the complete dataset, the application does not offer a comprehensive evidential basis to evaluate the balance between potential benefits and harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not sufficiently represent the magnitude of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. This significant level of impact has not been properly conveyed, especially in the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the actual visual impact has been understated, which undermines the reliability of the assessment.

An additional deficiency in the assessment is its failure to consider the interconnected

relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting, visually and spatially linked to the Atlantic horizon. Instead of acknowledging their interdependence, the assessment treats these heritage assets as isolated, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This impact is not merely visual; it represents a broader cultural and spatial harm that has not been adequately assessed. From a policy standpoint, the proposal contradicts National Planning Framework 4 in terms of protecting natural places and historic assets. The scale of the proposed changes 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 assertion of policy compliance.

Lastly, it is clear that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is fundamental and permanent, incapable of reduction to an acceptable level through mitigation. Collectively, these deficiencies in the assessment 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's evaluation of construction and pollution risks lacks comprehensiveness, preventing a thorough assessment of its likely environmental impacts. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent is granted, which hinders any meaningful appraisal of their effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of the impacts on fisheries and marine life, failing to provide a comprehensive evaluation of both ecological and socio-economic factors. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vital fishing industry, yet the proposal does not adequately protect or maintain these essential uses and habitats from significant disruption.

One major concern is the unfounded assumption that fishing activity can be relocated without adverse effects. The application does not offer any proof that alternative fishing grounds exist, are accessible, or can sustain additional pressure. This critical oversight raises the risk of overfishing in other areas, which could have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, it is impossible to fully understand the potential impacts on fisheries and local livelihoods.

The proposal further jeopardises marine species, especially due to the underwater noise associated with construction activities. Prolonged high-energy hammer piling is expected to disturb marine life over considerable distances, particularly impacting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is concerning; however, the application downplays these effects, lacking adequate supporting evidence.

Additionally, there is an apparent contradiction within the application, acknowledging that licences are required to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This inconsistency calls into question the reliability of the assessment and raises alarm about compliance with the

Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to account for cumulative impacts from multiple stressors, including habitat disturbance, noise pollution, and the 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 falls short of demonstrating adherence to the National Planning Framework 4 and the National Marine Plan. It does not illustrate how the development can coexist with existing marine users or avoid unacceptable harm to marine biodiversity, thus precluding any assertions that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is inadequate and fails to account for the full range of impacts from a single integrated project. The offshore turbines and onshore works are intrinsically linked; however, they are evaluated separately, leading to a disjointed analysis that obscures the true extent of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure that traverses sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a comprehensive understanding of the project's overall environmental footprint.

The exclusion or deferral of onshore impact assessments prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively, yet the division between offshore and onshore elements results in an incomplete picture of the combined impacts on peatlands, habitats, and local communities.

Additionally, the proposal poses substantial risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application fails to show that impacts on these habitats have been comprehensively assessed or that appropriate avoidance measures have been put in place, creating a significant evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance, as disturbances in peatland can release stored carbon and potentially create a carbon debt, which contradicts renewable energy development objectives. The application does not sufficiently address this concern or demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence provided that necessary consents or processes have been initiated, which raises serious questions about the deliverability and legality of the proposed implementation.

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

Collectively, the separation of project components, the absence of a comprehensive assessment, and the failure to provide evidence on environmental and land use impacts render this part of the application incomplete and unreliable, which ultimately prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Now, this new application is presented under a framework that more strongly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis for determining this application. There are deficiencies in baseline data, an undefined design envelope is employed, and unspecified mitigation measures are relied upon. Key impact pathways concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects have not been addressed. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a clear understanding of the likely significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a comprehensive Social Impact Assessment represents 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 unfit for consideration.

This proposal stands in direct contradiction to National Planning Framework 4. It does not demonstrate protection for biodiversity, natural areas, and cultural heritage.

Furthermore, it fails to show that impacts on health and wellbeing are acceptable and cannot provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been thoroughly assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis

I formally object to the above application as it contravenes the following planning policies and guidance:

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the N4 area for development. The plan was imposed on them without consent.
Scotland's National Marine Plan (NMP) GEN 18 'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.'
NMP Para. 4.77 'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes,'
NPF4 Spatial Principles - Just Transition. 'We will empower people to shape their places.'

Lack of understanding of Cultural Significance: The EIAR makes no reference to the personal, cultural or historical attachment of the population of Lewis to their landscape and heritage, and fails to assess impacts on the living intangible heritage of the Gaelic community. Until a full assessment addressing impacts on Gaelic language and culture, community wellbeing, and west Lewis communities' relationship with their coastline is completed and publicly consulted upon, this application cannot lawfully be determined.
NMP Para. 4.20 'The historic environment includes all aspects of the environment resulting from the interaction between people and places through time,'.
NPF4 Policy 7 a 'Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place.'

Significant Adverse Impacts on Protected Birdlife and Habitats: The development occupies primary foraging grounds for the Lewis Peatlands SPA red-throated divers, falls within the foraging range of the St Kilda gannet colony, and crosses a principal UK migratory corridor for protected species, including whooper swan and pink-footed goose. The EIAR fails to adequately assess the threats of collision, displacement, and barrier effects to these declining populations. Thus, consent would breach the Conservation (Natural Habitats &c.) Regulations 1994, the 2018 Offshore Regulations, the Marine (Scotland) Act 2010, and the Wildlife and Countryside Act 1981, as the proposal is likely to adversely affect the integrity of the following SPA's: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda.
NPF4 Policy 7 l 'Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved.'
NPF4 Policy 11 e ix Impact on 'biodiversity including impacts on birds' must be addressed.

Failure to Protect the Integrity and Setting of Scheduled Monuments: The EIAR anticipates significant adverse effects on coastal heritage. It fails to assess the impact on key scheduled monuments such as SM13786. The proposal would harm the Calanais monuments and wider historic landscape by introducing an industrial horizon into their natural surroundings, fundamentally undermining the meaning, experience, and interconnected setting of these sites, directly conflicting with NPF4 Policy 7. There are many alternative sites for offshore wind development and no reasons of over-riding public interest for choosing this site.
NMP Para. 4.22 'Marine planning should help to ensure that future marine activities and developments can be carried out in a way that respects the marine historic environment and the setting of important coastal heritage assets.' Para. 4.23 'Designated assets should be protected in situ within an appropriate setting'.
NPF4 Policy 7 h 'Development proposals affecting scheduled monuments will only be supported where:' ii 'significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or iii exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.'
Unassessed Onshore Impacts and Breach of Statutory Rights of Crofters: Granting offshore consent while onshore impacts on irreplaceable machair and deep peatland

remain unassessed, directly contravenes NPF4 Policy 3, which requires biodiversity (including irreplaceable habitats) to be left in a demonstrably better state. In addition the proposal fails to engage the statutory rights of crofters under the Crofters (Scotland) Act 1993.
NMP Para. 4.77 ‘There should be a presumption in favour of publicising applications for marine and terrestrial components of a development together during consenting processes.’

Irreparable Harm to the Tourism Economy and Coastal Character: The Spiorad na Mara wind farm would permanently industrialise the unspoiled coastal scenery and dark skies on the Isle of Lewis, destroying the very qualities that attract visitors to the island. Local residents have consistently warned during consultation that this visual impact would decimate the tourist industry on which so many islanders depend. Tourism is built on the area’s landscape, seascape, heritage, nature, and dark skies. This development risks long-term damage to local businesses and the wider economy, contrary to NPF4 Policy 30.
NMP, Para. 12.28 ‘An unspoiled environment, high quality landscape and a sense of closeness to nature are important to many people. Scenery and environmental quality are key factors in attracting visitors to Scotland’s coasts,’

Community Opposition and lack of Community Empowerment: The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by www.emg-lewis.co.uk in April 2026 found that 88% of residents from Ness to Uig opposed the N4 development. Approving this project against such overwhelming local consensus would directly contravene the National Islands Plan's commitment to community empowerment.
The National Islands Plan, page 65, para. 5 ‘Our vision is for islanders to be empowered to shape their own priorities, build their futures, and protect what makes their communities unique.’
My further objection points:

This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm

to landscape and seascape character, heritage setting, and the tourism economy.
I respectfully request that this application is rejected.

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: B8E36A0D

Member of the public 1669

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is set to be located off the west side of the Isle of Lewis, a region renowned for its Atlantic-facing coastline, nearly untouched natural environment, and deep-rooted cultural identity. Concerns regarding the scale, proximity, and design of this development raise serious questions about its alignment with statutory requirements, national policies, and the core principles of sustainable development.

The application itself lacks an adequate evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is scarce and inconsistent, and several key facets of the proposal are still not clearly defined. Moreover, the use of a flexible design framework obscures the understanding of potential significant impacts, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community repercussions, leaving unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with established policy frameworks. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and public health. It does not successfully illustrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts fundamentally challenge the statutory tests necessary for consent and compromise the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of this proposal poses additional concerns, with large turbines planned in close proximity to the shoreline, raising serious issues about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these circumstances, it is essential that the precautionary principle be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development inadequately addresses the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A notable deficiency is evident in the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features, overlooking their continued use and meaning, as well as the potential impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their importance to community life.

Moreover, the application fails to acknowledge intangible cultural heritage, which encompasses the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity but have been completely omitted from the assessment, creating a significant gap in understanding the cultural impact of the development.

Concerns extend to community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity that aligns with characteristics of an Indigenous People; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural error is the absence of a compliant Island Communities Impact Assessment, mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, the inadequacies present in the proposal conflict directly with National Planning Framework 4, particularly concerning the protection of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the lack of recognition for living cultural practices, clearly deviates from established policy requirements.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines close to the shoreline represents a significant threat to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. Such an industrial presence would create a continuous and dominant alteration to the landscape, leading to a permanent and irreversible transformation that undermines its character.

The application lacks a proper representation of the scale of the visual change that would occur. The height and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment fails to accurately reflect the level of impact and its significance within this sensitive landscape.

There are serious methodological issues regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of the visual impact has been understated, undermining the reliability of the overall assessment.

Moreover, the assessment does not adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked to the Atlantic horizon through visual and spatial connections. Treating these sites as isolated entities disregards their interdependence and leads to an incomplete understanding 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 affecting their link to the natural horizon. This results not only in visual impacts but also in broader cultural and spatial harm that the application fails to assess adequately.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment seriously undermines any assertion of policy compliance.

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

Overall, the assessment fails to adequately represent the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and

heritage. These shortcomings prevent a reliable evaluation and highlight that the proposal is incompatible with the protection of this invaluable landscape.

SUMMARY

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

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

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

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

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

Additionally, the proposal would bring about considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the

loss of dark skies, disruptions to cultural and visual relationships, and the impacts on tourism signify permanent effects that cannot be mitigated to an acceptable level.

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

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

Yours faithfully,

[Redacted]

Member of the public 1670

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. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies related to planning, environmental impacts, cultural heritage, and procedural integrity.

The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The scale and design of the project, particularly the placement of large turbines in close proximity to the shoreline, raise serious concerns about landscape capacity, visual impact, and overall environmental consequences.

Fundamental flaws are evident in the application, as it lacks an adequate evidential foundation necessary for a lawful determination. There is a noticeable absence of critical environmental data, with limited and inconsistent baseline information, while key elements of the project remain undefined. The flexible design framework utilised impedes a clear assessment of the likely significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a thorough understanding of potential environmental, cultural, and community impacts, rendering claims of negligible effects unsubstantiated by robust evidence.

Moreover, the proposal presents clear and substantial 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, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests for consent and undermine the competent authority's capacity to deem the development acceptable from a policy standpoint.

In light of the unprecedented scale of this proposal in its specific location and the various evidential weaknesses present, it is clear that the application is incomplete and unable to support a lawful determination. Therefore, the precautionary principle must be applied in this context.

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 assessment of alternatives is fundamentally flawed and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of realistic alternatives with respect to environmental effects, the application merely recounts the evolution of the project. This narrative fails to prove that less harmful options have been thoroughly identified,

assessed, and preferred over more damaging solutions.

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

These shortcomings also extend to the assessment of cable routing and landfall, as there is inadequate evidence that alternative routes have been sufficiently explored 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 the absence of comparative analysis suggest that mitigation by design has not been implemented, with an overreliance instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been reduced through thoughtful site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more appropriate alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy perspective, this deficiency compromises adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a material oversight that supports the overall conclusion that the application lacks adequate evaluation and cannot justifiably receive a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity in the current application is fundamentally inadequate. It adopts a reductive view, treating heritage merely as a collection of isolated and static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are essential as active places of burial and spiritual practice. Unfortunately, the assessment reduces these vital sites to static features, ignoring their continued use and meaning, as well as the impact of development on their settings. This mischaracterisation leads to an incomplete evaluation of cultural effects and

disregards their importance in community life.

Furthermore, there is a notable absence of consideration for intangible cultural heritage, including the Gaelic language, local traditions, and the long-standing connection between the community and the coastal environment. These elements are central to the area's identity yet remain entirely overlooked in the assessment, representing a significant gap. Without their inclusion, the cultural impact of the development cannot be fully understood.

Community rights and engagement are also significant concerns. The Gaelic-speaking population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the application lacks a process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the assessment's legitimacy and neglects established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

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 neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly departs from policy requirements.

Collectively, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application does not provide a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is inadequate and lacks the necessary transparency for a lawful evaluation. While the developer engaged local residents through a commissioned Social Impact Assessment and focus groups, the full report remains unpublished. This omission creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks highlighted by the developer's research.

Moreover, available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement, not speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings adequately or ascertain their significance within the decision-making framework.

There are also indications that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” mentioned in the developer’s own findings. Despite the recognition of these impacts, they have not been sufficiently integrated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be adversely affected. The failure to provide the complete dataset means the application does not present a comprehensive evidential basis for weighing benefits against harm.

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

The procedural implications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to meet the evidential standards of the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The assessment of seascape, landscape, and visual impacts associated with the proposal is deficient and fails to adequately reflect the scale of change and the sensitivity of the environment. The introduction of large-scale turbines close to the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming the character of the landscape in a permanent and irreversible manner.

The application does not sufficiently represent the extent of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities that define naturalness and remoteness. The current assessment does not accurately convey the level of impact or its significance in the context of such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, thus challenging the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked to the Atlantic horizon through visual and spatial relationships. The treatment of these sites as isolated assets does not acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change proposed is incompatible with the necessity to safeguard 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 remains dominant and unavoidable. Consequently, the change would be fundamental and permanent, and not amenable to reduction to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is inadequate, failing to provide essential details needed to evaluate likely environmental effects. The project entails considerable seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will be formulated after consent is granted, which hinders any meaningful assessment of their potential

adequacy or effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly considering the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and vital habitats that are at risk of damage from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty surrounding 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 the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is received, the application prevents a proper evaluation of whether suitable safeguards are in place to respond to pollution incidents. This creates procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and mitigation must be conducted prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainties regarding potential impacts collectively render the assessment materially deficient. These issues obstruct a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism appeal. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and disruptive “wall of light” effect that would drastically change the night-time environment.

This application fails to evaluate how such lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This neglect is particularly troubling given the importance of dark skies to the local identity and the emerging tourism sector focused on astro-tourism. Consequently, there is a pronounced gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, failing to address how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further compounded by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding ecological impacts.

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

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. Furthermore, it diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential element of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a significant shortfall in meeting the standards of sustainable development when evaluated against statutory obligations, national policy, and required evidence. This application reiterates the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable level of industrialisation. Now, it is introduced under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and the wellbeing of communities.

There are critical deficiencies in the evidential foundation provided for the

determination of the application. Key baseline data is missing, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, the application neglects crucial impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set forth by the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment represents a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, rendering the application unsuitable for determination.

The proposal stands in stark contradiction to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage. There is insufficient evidence to confirm that impacts on health and wellbeing are acceptable, nor can it substantiate a net economic benefit, largely due to the absence of tourism impact analysis. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks remain considerable. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The required evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful determination of acceptable impacts.

This proposal would bring about significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the potential repercussions for tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental concerns, inhibit a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to require the submission of the outstanding information.

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

Additional Comments

As someone who lives on the west coast, having all this on-shore/off-shore Industrialisation coming to the Island with no clear long term benefits is such a slap in the face, especially given that there is no clear indication that our electricity prices will go down.
Having recently visited Shetland and speaking to locals about their new and functioning windfarm, those i spoke to all said that the over all deal the Island got was a bad one, and that a lot of the time the turbines have to be shut down due to over producing, which then results in constraint paymetns to the farm which is essentialy paid for by consumers.
The UK also does not need more electricity generated, it currently has enough being produced between renewables, nuclear and imported supplies so the only real reason this is being persued is for business/money reasons.

This as well as the planned on shore work including HVDC connector station is going to be the beginning of the end of the Island as a tourist 'hot spot', not to mention the end of having one of, if not thee darkest skies throughout Europe.

A real shame for the future and the Island as a whole.

Yours faithfully,

[Redacted]

Member of the public 1671

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

Dear Sir/Madam

This letter is a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and supporting documents, highlighting material deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. It contains missing critical environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal are not clearly defined. The flexible design framework inhibits a clear understanding of likely significant effects, while unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not backed by robust evidence.

There are clear policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, with large turbines positioned near the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents numerous deficiencies that render it unreliable and incomplete. It heavily relies on undefined mitigation measures, monitoring strategies, and management plans that have not yet been articulated. This

approach seeks consent based on the premise that environmental harms will be managed in the future, thus obstructing any meaningful evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Deferring critical information to the post-consent stage is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates the clear establishment of significant effects and their mitigation before any determination is made.

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

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is fundamentally flawed and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of realistic alternatives based on environmental effects, the application presents a narrative of project development that fails to show that less harmful options have been adequately identified and assessed in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has given serious consideration to placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline's sensitivity, coupled with the critical importance of proximity to shore in assessing impact, means that the absence of such analysis renders it 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 that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation by design has not been employed, with an overreliance on post-design mitigation measures instead.

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

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that supports the overall conclusion that the application has not undergone adequate evaluation and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is inadequate, resulting in an unreliable understanding of the ecological receptors present. This coastal area is known for its sensitivity and biological activity; however, the baseline data provided is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant oversight concerns otters, which are classified as a European Protected Species. The application does not appropriately recognise or assess their active use of coastal zones for foraging and movement. By failing to consider their core foraging range and behavioural patterns, the assessment does not adequately evaluate the potential impacts of construction disturbances, noise, and increased activity, thereby undermining any conclusions about the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys has introduced notable detection bias, particularly in challenging Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest frequent use of these waters. The omission of this relevant data leads to an incomplete baseline, further undermining the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the requirements outlined in the Environmental Impact Assessment regime and the National Planning Framework 4. The assessment has not properly identified or evaluated protected species, leading to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. As such, the precautionary principle is engaged, making it unlawful to grant consent in these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. The ornithological assessment related to the development in this area is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application fails to meet the evidential standard required to demonstrate that these seabird species will not experience adverse effects. Key foraging areas and migratory pathways are not adequately evaluated within the assessment, particularly concerning the risks of displacement, collision, and habitat loss.

There exists a fundamental contradiction within the application itself. The developer asserts that there will be no significant adverse effects, yet simultaneously presents a case for Habitats Regulations derogation, which is invoked only when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient evidence regarding the potential impacts on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The crucial feeding grounds for these species are inadequately accounted for, and the reliance on modelling introduces considerable uncertainty, especially for species like Kittiwakes and Fulmars that are already experiencing severe population declines.

The siting of turbines within a recognised migratory corridor introduces a notable and additional risk, potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment fails to thoroughly investigate the long-term consequences of sustained mortality within this corridor and the potential impacts on species that have relatively small global populations. From a

regulatory standpoint, the application does not satisfy the evidential threshold necessary to assert 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 the modelling approaches, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle, thereby obstructing a lawful conclusion that would support consent.

Moreover, the deficiencies identified reflect a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to internal inconsistencies, methodological shortcomings, and insufficient evidence. Such deficiencies hinder a thorough evaluation of impacts, leading to the conclusion that the application fails to satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The shortcomings in the assessment of cultural heritage and community identity are glaring and cannot be overlooked. It fails to acknowledge the West Lewis coastline as a vibrant cultural landscape, where the environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a limited perspective, treating heritage merely as a collection of isolated, static assets. This narrow view neglects the ongoing social, cultural, and spiritual functions these sites serve within the community.

Particularly concerning is the treatment of significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places of burial and spiritual practice. However, the assessment categorises them as static features, overlooking their continued use and significance, along with the potential impacts of development on their surrounding environment. Such a mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their vital role in community life.

Additionally, the failure to assess intangible cultural heritage is troubling. Elements like the Gaelic language, local traditions, and the community’s enduring relationship with the coastal environment are integral to the area's identity, yet they are entirely omitted from the assessment. This absence represents a significant gap, hindering a proper understanding of the development's cultural impact.

There is also a critical lack of community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent undertaken, undermining the legitimacy of the assessment and neglecting established principles for participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment is a

procedural failure that cannot be ignored. This assessment is a statutory requirement under 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 invalidates a lawful determination.

From a policy standpoint, these deficiencies position the proposal in direct contradiction to the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, represents a clear deviation from policy requirements.

Overall, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The true cultural impacts of the development remain unassessed, and the application does not provide an adequate foundation for understanding the real cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application presents significant procedural implications due to the non-disclosure of the complete Social Impact Assessment. This omission prevents the competent authority from conducting a thorough socio-economic and health evaluation, which is essential for compliance with the evidential requirements of the Environmental Impact Assessment regime.

Furthermore, the assessment of health, social impacts, and wellbeing is significantly deficient, lacking the necessary transparency for a lawful evaluation. Although the developer engaged local residents through focus groups as part of the Social Impact Assessment, the full report remains unpublished. This represents a critical evidential gap, obstructing both public understanding and the competent authority's grasp of the social risks identified by the developer’s own research.

Available summaries reveal that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are thus not speculative. Nevertheless, the absence of the full assessment limits the potential for proper scrutiny of these findings, making it challenging to ascertain their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer’s findings. Despite this, the application has not fully integrated these impacts or afforded them appropriate weight, thereby obscuring the true human and social costs associated with the development.

The lack of transparency in disclosing the full dataset undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic,

and health impacts is paramount for developments of this magnitude, particularly when community character and functioning may be at stake.

From a policy perspective, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. While development should promote positive health outcomes and avoid harm, available evidence indicates pre-existing adverse effects that remain undisclosed. Therefore, without the complete assessment, adherence to this policy cannot be adequately evidenced.

Taken together, the non-disclosure of the complete Social Impact Assessment, alongside existing evidence of adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts, seascape, and landscape is fundamentally inadequate, failing to capture the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, a lack of development, and a strong sense of isolation. The proposed large-scale turbines situated near the shoreline would introduce a continuous industrial presence, fundamentally altering this landscape and leading to a permanent transformation of its character.

The application does not sufficiently represent the extent of visual alteration. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and representation of visual viewpoints. It appears that the selected viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact has been underestimated, thus compromising the reliability of the assessment.

Moreover, there is a notable lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites like 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 approaches these sites as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the

context in which heritage assets are perceived and severing their ties to the natural horizon. This constitutes not only a visual impact but also a more profound cultural and spatial detriment that has not been adequately examined within the application.

From a policy standpoint, the proposal contradicts the principles of National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The scale of transformation is at odds with the requirements to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a rigorous worst-case assessment further weakens the argument for compliance with policy guidelines.

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. Consequently, the change would be fundamental and irreversible, rather than reducible to an acceptable level through mitigation efforts.

Collectively, these issues highlight the assessment's failure to accurately portray the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. Such deficiencies hinder a reliable evaluation and further support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal for construction within the high-energy Atlantic environment along the West Lewis coastline raises significant concerns regarding its environmental assessment. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, instead deferring important mitigation and contingency measures to a post-consent stage. This reliance on undefined future measures hinders a proper evaluation of their adequacy and effectiveness, especially given the sensitivity of the receiving environment.

The coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these risks. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation, which complicates the determination of the extent, duration, or ecological effects of these impacts. This uncertainty is particularly pertinent for marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By leaving contingency planning for after consent, the application raises procedural risks and undermines the competent authority's ability to assess the necessary environmental protection measures during the decision-making process. From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime, which

stipulates that likely significant effects and mitigation must be assessed prior to granting consent. Without this information, a lawful determination cannot be achieved, and the application does not demonstrate compliance with the relevant policy requirements for environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these essential uses and habitats can be preserved or sustained without substantial disruption.

A critical concern is the assumption that fishing activity can be displaced without repercussions. The application lacks evidence that alternative fishing grounds are both available and capable of accommodating the additional pressure that would result from displacement. This oversight is important, as such displacement could lead to overfishing in other areas, potentially affecting the local fleet's economic viability. Without a solid, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise that would be generated during construction activities. The use of high-energy hammer piling for prolonged periods is expected to create disturbances over considerable distances, impacting species such as dolphins. The anticipated effects on a significant portion of the local bottlenose dolphin population are concerning, yet the application minimizes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency within the application, where the need for licences to allow harm to European Protected Species is acknowledged, while the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly in cases where anticipated harm requires legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and fishing activity displacement. A comprehensive evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the

National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which prevents a conclusion that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence concerning fishing displacement, an underestimation of acoustic impacts, and internal contradictions renders the assessment incomplete and untrustworthy. These shortcomings inhibit a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of onshore infrastructure is fundamentally flawed, failing to account for the comprehensive impacts of what constitutes a single integrated project. The offshore turbines and the related onshore activities are inherently interconnected, yet they have been assessed in isolation. This fragmented approach obscures the complete understanding of environmental and socio-economic consequences.

Onshore components include cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon reservoir and ecologically delicate habitat. The application does not offer a thorough evaluation of these impacts, which hinders a full appreciation of the project's overall environmental footprint.

The omission or deferral of onshore impact assessments restricts the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be considered collectively; however, the distinct treatment of offshore and onshore elements results in a failure to grasp the combined effects on peatlands, habitats, and local communities.

Significant risks are posed to sensitive environments, including machair systems and peatland areas, which are designated for policy protection. The application lacks clear evidence that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This reveals a distinct evidential gap regarding the protection of biodiversity.

Concerns also arise regarding the carbon balance associated with the proposal. The disturbance of peatland leads to the release of stored carbon, which may create a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern and does not prove that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application fails to demonstrate that the required consents or processes have been initiated, which raises significant

doubts about the feasibility and lawful execution of the project.

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

Overall, the separation of project elements, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this segment of the application incomplete and untrustworthy, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment is a significant omission that raises serious concerns. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the environmental quality, cultural identity, and tourism potential of the area. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is especially critical as dark skies contribute to the identity of the area and are increasingly important for emerging tourism sectors such as astro-tourism. The absence of this assessment reveals a glaring gap in the overall landscape and environmental evaluation.

Equally concerning is the lack of consideration for nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can result in disorientation and a heightened risk of collisions. The proposal does not include any assessment of the lighting's impact or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and their mortality rates.

The deficiencies in the ornithological assessment are compounded by the reliance on daytime survey data, which fails to account for nocturnal behaviours 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 addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The evidential standard required to exclude potential adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle

and preventing a lawful determination.

Moreover, this omission conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality, undermining the overall assessment of landscape and seascape impacts. Night-time character is an integral aspect of the environment that has not been sufficiently addressed.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development when evaluated against national policy, statutory obligations, and evidential requirements. Notably, this application brings forth the same principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, which highlighted an unacceptable level of industrialisation. Although presented under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application remains fundamentally flawed.

A significant concern is the lack of a complete and reliable evidential basis for determination. Critical gaps exist in baseline data, and there is continued reliance on an undefined design envelope alongside unspecified mitigation measures. Key impact pathways are omitted, including those related to nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are marked deficiencies. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission, impeding the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. Such oversights render the application unfit for determination.

Furthermore, the proposal directly contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Additionally, it fails to show that health and wellbeing impacts are acceptable and lacks the necessary 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 obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal are uncertain and potentially

significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside conflicts with policy and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to compel the submission of the necessary information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Yours faithfully,

[Redacted]

Member of the public 1672

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 review of the Environmental Impact Assessment Report and its supporting documentation reveals several material deficiencies related to planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of this proposal, along with its proximity to the shore, raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

There is a notable lack of critical environmental data within the application, with baseline information being both limited and inconsistent. Key components of the proposal remain undefined, and the flexible design framework obstructs a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The application exhibits clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural habitats, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and impair the competent authority's capacity to determine the development's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, clear, or trustworthy account of the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty and hinders a consistent evaluation of a worst-case scenario. This lack of clarity undermines the assessment's credibility, preventing both the public and the competent authority from grasping the true scale of environmental impacts.

Furthermore, the application significantly depends on unformulated mitigation measures, monitoring strategies, and management plans. Seeking consent under the premise that environmental damage will be addressed later restricts any substantial appraisal of effectiveness or evaluation of residual impacts. This postponement of essential information to post-consent stages is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations are clearly defined prior to decision-making.

Moreover, the assessment contains notable evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly in instances where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that fail to meet statutory obligations.

Consequently, the application does not satisfy the evidential standards 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 does not adequately demonstrate compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unclear whether impacts have been thoroughly assessed or if suitable safeguards exist.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the deficiencies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and rigorous evaluation of environmental effects, placing the competent authority in a position where it cannot adequately assess the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a comprehensive assessment of alternatives, falling short of the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it merely presents a narrative of the project's evolution. This

method does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging alternatives.

There is a notable absence of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application fails to show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts are likely to be less severe. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to the shore in assessing impact, renders the lack of such analysis a significant shortcoming, inhibiting any conclusion that the proposed siting is the least damaging option.

These deficiencies are apparent in the areas of cable routing and landfall assessment, as there is insufficient evidence to suggest that alternative routes have been properly evaluated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually important sites such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the lack of comparative analysis indicate that mitigation by design has not been applied, relying instead on post-design mitigation measures.

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

From a policy standpoint, these shortcomings undermine compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community well-being. The absence of a structured and comparative assessment represents a material omission that leads to the overall conclusion that the application has not been sufficiently evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application presents significant deficiencies that undermine its reliability and completeness. This coastal environment in West Lewis is recognised as a highly sensitive and biologically active marine system. However, the methodologies employed do not adequately capture essential data regarding species presence, behaviour, and habitat use, resulting in a weak evidential basis for evaluating potential impacts.

Of particular concern is the treatment of otters, a European Protected Species, where the application fails to fully recognise their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and increased human activity have not been sufficiently evaluated. Consequently, this lack of consideration undermines any conclusions drawn about the absence of significant

effects on otters.

Moreover, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduces considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate a frequent use of these waters. The failure to include or adequately consider this data leads to an incomplete baseline, further diminishing the reliability of the conclusions offered.

These methodological weaknesses result in assessments of negligible or non-significant effects that are based more on assumptions than on solid evidence. The absence of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates a significant level of uncertainty regarding the actual risks posed to marine species and their 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 uncertainties introduced prevent a clear exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for development presents a concerning lack of reliability stemming from its ornithological assessment, which contains significant gaps and inconsistencies. The assessment fails to provide adequate evidence that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. Key foraging areas and migratory pathways crucial to these species have not been sufficiently evaluated regarding the risks of displacement, collision, or habitat loss.

Moreover, a fundamental contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, typically required only in anticipation of significant harm. This inconsistency raises serious doubts about the credibility of the assessment and suggests that its conclusions are not substantiated by the available evidence.

The assessment's failure to address the importance of protected sites, such as the

Lewis Peatlands and St Kilda, further highlights its deficiencies. The reliance on modelling approaches introduces considerable uncertainty, especially regarding species facing severe decline, like Kittiwakes and Fulmars. Methodologies used may underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain poorly understood.

The siting of turbines within a recognised migratory corridor poses a further significant risk, creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor has the potential impact on species with limited global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to affirm that there will be no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been met. This raises the necessity to apply the precautionary principle, which inhibits a lawful conclusion in favour of consent.

Overall, the assessment is characterised by internal inconsistencies, methodological shortcomings, and a lack of sufficient evidence. These factors hinder a thorough evaluation of the potential impacts and collectively indicate that the application does not satisfy the statutory requirements essential for determination. Furthermore, the identified deficiencies are inconsistent with the National Planning Framework 4's stipulations on biodiversity protection and the safeguarding of natural assets. The proposal's inability to demonstrate that it will not adversely affect internationally significant seabird populations places it in direct opposition to national policy.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts a simplistic viewpoint, perceiving heritage merely as a collection of static, isolated assets without recognising their ongoing social, cultural, and spiritual relevance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial places and centres of spiritual practice, yet they are erroneously classified as static features. This oversight neglects their current use, significance, and the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete assessment of cultural effects, disregarding their importance within community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and

the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, leading to a substantial gap in understanding the cultural ramifications of the development.

Concerns are further compounded by issues relating to community rights and participation. The Gaelic-speaking population embodies a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Additionally, a crucial procedural error is the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to appraise the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful decision-making process.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, alongside failing to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the inadequacies in assessing living heritage, intangible cultural significance, community rights, and statutory requirements culminate in a substantial evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a robust foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall evaluation of social impacts, health, and wellbeing is notably inadequate and lacks the necessary transparency for a lawful assessment. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified in the developer’s own research.

Summaries that are currently accessible reveal that residents are experiencing tangible levels of stress, anxiety, and concern as a result of the proposal's scale and proximity. These findings stem from direct community engagement and are therefore based on concrete evidence rather than speculation. The failure to release the full assessment limits scrutiny and restricts the capacity to evaluate the significance of these issues in the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to the

community's identity and cohesion, with the term "cultural loss" arising in the developer's findings. Yet, these implications have not been adequately reflected in the primary application, nor given the appropriate consideration they warrant. Withholding the full Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

This absence of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is crucial for developments of this magnitude, especially when community character and functionality are at stake. The lack of the complete dataset means the application does not provide a thorough evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application fails to show alignment with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid detriment; however, the available evidence suggests that there are existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy is not possible.

The procedural consequences are significant. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

When taken together, 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 strengthens the argument 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 reliance on undefined future measures raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

The assessment of construction and pollution risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. The application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills but does not supply sufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures compounds these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the point of determination. From a regulatory perspective, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed prior to consent, and in the absence of this information, a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts render the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to adequately assess the ecological and socio-economic impacts, raising immediate concerns about the protection and maintenance of these vital uses and habitats. A significant issue lies in the unfounded assumption that fishing activities can simply be displaced without repercussions. The absence of evidence regarding the availability, accessibility, and capacity of alternative fishing grounds is critical, as such displacement could lead to overfishing elsewhere and potentially threaten the livelihoods of the local fishing fleet. The implications for fisheries and local economies cannot be properly understood without a thorough, evidence-based assessment.

Moreover, the proposal poses substantial risks to marine species, particularly due to underwater noise from construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disrupt a wide area, with notable effects on species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes

these impacts, lacking the necessary supporting evidence to justify this downplaying.

There exists a contradiction within the application: while it acknowledges the requirement for licences to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially given that anticipated harm might necessitate legal authorisation.

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

From a policy standpoint, the application does not satisfy the requirements of the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusion regarding the proposal's sustainability.

In summary, the deficiencies regarding evidence of fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies severely undermine the assessment's completeness and reliability. These issues obstruct a thorough evaluation of the impacts on marine life and fisheries, necessitating immediate action to address these critical concerns.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is inadequate and fails to address the full range of impacts associated with what constitutes a single integrated project. There is a fundamental connection between the offshore turbines and the onshore works, yet these components are evaluated in isolation. This fragmented assessment obscures the comprehensive understanding of the environmental and socio-economic repercussions that arise.

The onshore infrastructure encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in regions of deep peat, specifically within Barvas Moor, which serves as a critical carbon store and is an ecologically fragile habitat. The application lacks a thorough assessment of these impacts, which hinders a complete understanding of the overall environmental footprint of the project.

By not adequately addressing the onshore impacts, the application inhibits a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, it is essential that all elements of a project are considered collectively. The

current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

Moreover, there are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policies. The application fails to demonstrate that impacts on these critical habitats have been thoroughly assessed or that suitable avoidance measures are in place, resulting in a concerning evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance related to this proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or provide assurance that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises significant doubts about deliverability and the lawfulness of implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests contradicts the principles outlined in the National Marine Plan and National Planning Framework 4. The inability to establish that adverse impacts can be avoided or mitigated further weakens the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

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

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

TOURISM

The assessment of tourism impacts within the application 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 area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. The application itself states that 86% of visitors are attracted by the scenery; however, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

The economic growth of tourism is notable, having risen from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Nevertheless, the application neglects to model the potential effects of industrialising the seascape and the resulting decline in environmental quality on Tourism Gross Value Added or the resilience of the wider economy. In the absence of this analysis, it remains unclear if the proposed

development would yield a net economic benefit or detract from an established and expanding sector.

Moreover, the assessment does not account for the crucial role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experience 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 impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and falls short of providing adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the combined failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a significant evidential gap. This situation inhibits 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 comply with the principles of sustainable development as outlined by statutory duties and national policy. This application echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Presenting this new proposal under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate the underlying issues.

Critical deficiencies in the evidential basis for assessment are evident. There are notable gaps in baseline data, an undefined design envelope continues to be used, and unspecified mitigation measures are relied upon. Furthermore, key impact pathways—such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism—have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting a comprehensive understanding of potential significant effects and residual impacts.

Procedural shortcomings are also apparent. The lack of a compliant Island

Communities Impact Assessment signifies a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide a full Social Impact Assessment constitutes a material omission that limits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling precludes evidence of net economic benefit. Moreover, the cumulative impacts of both offshore and onshore components have not been properly evaluated, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals lead to internal inconsistencies. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing lawful conclusions regarding the acceptability of impacts.

This proposal would result in irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and adverse effects on tourism represent permanent changes that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct the ability to reach a lawful, evidence-based decision. It is imperative that the competent authority refuses consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or utilises the relevant regulatory provisions to demand the submission of the missing information.

Additional Comments

I am writing as a resident of the Isle of Lewis, living near the coast on the Westside of the island.

While I understand the importance of renewable energy and the need to address climate change, I have serious concerns that this project would cause unacceptable harm to the unique environment, wildlife, community character, and cultural identity of our island.

First, the environmental consequences of such a large-scale development on Lewis could be profound. Our island's landscapes, peatlands, and coastal ecosystems are internationally significant and deeply fragile. Construction on this scale risks damaging peat habitats that store vast amounts of carbon, potentially undermining some of the climate benefits the project claims to provide. Disturbance to moorland, water

systems, and coastal environments could have lasting consequences for biodiversity and ecosystem health.

Second, I am deeply concerned about the impact on wildlife. Lewis is home to important populations of seabirds, golden eagles, waders, migratory birds, and marine life that depend on our coastlines and open landscapes. Turbine construction, noise, and blade strikes could threaten bird populations, while associated infrastructure may disrupt breeding grounds and migration routes. Our natural heritage is irreplaceable, and once damaged it may not recover.

Third, tourism is a vital part of our local economy. Visitors come to Lewis for its unspoiled beauty, dramatic coastlines, archaeological heritage, and sense of remoteness. Industrial-scale wind turbines risk transforming the visual character of the island, especially in coastal and scenic areas, potentially discouraging tourism and harming local businesses that rely on preserving the island's natural appeal.

Finally, I fear for the erosion of our island culture and identity. Lewis is not simply a location for energy infrastructure—it is a living community with deep Gaelic roots, crofting traditions, and a strong connection to land and sea. Developments of this scale risk prioritizing external commercial interests over the voices, wellbeing, and heritage of local residents.

Renewable energy must be pursued responsibly, with proper respect for communities and landscapes that are asked to bear its costs. I urge decision-makers to fully consider whether this development is appropriate for Lewis, and to prioritize the long-term protection of our environment, wildlife, economy, and cultural heritage.

For these reasons, I strongly object to the proposed N4 wind farm.

Yours faithfully,

[Redacted]

Member of the public 1673

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline, which raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The development is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application fails to provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts associated with this proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to conclude that the development is acceptable in policy terms.

Taken together, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In these circumstances, it is imperative that the precautionary principle applies.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, transparent, or dependable overview of the potential environmental impacts of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific dimensions, layouts, or configurations of the turbines, introduces considerable uncertainty. This situation hampers the ability to apply a worst-case scenario consistently and jeopardises the integrity of the

assessment, meaning that the impacts outlined may not correspond to the development that will ultimately be constructed. As a result, both the public and the competent authority are unable to fully comprehend the true extent of the environmental effects.

Furthermore, the application leans significantly on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the premise that environmental harm will be addressed later denies any meaningful evaluation of the effectiveness of these measures or an accurate assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation must be clearly identified prior to determination.

The report also presents notable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies engender uncertainty about the scale and significance of impacts, particularly where conclusions indicating 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 and introduces scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential standards set under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly evaluated or that suitable safeguards are in place.

Overall, the reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data lead to an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The ecological assessment provided lacks the necessary completeness and reliability to understand the ecological receptors in the West Lewis coastal environment. This region is a biologically active marine system, yet the methodologies used have not sufficiently captured the presence, behaviour, and habitat use of marine species. Consequently, the assessment fails to deliver an evidential basis for evaluating potential impacts.

Significant shortcomings are evident in the treatment of otters, a European Protected Species. The assessment does not adequately acknowledge their use of coastal areas

for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts from construction activities, noise, and increased human presence are not thoroughly evaluated. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Similar deficiencies are noted in the assessment of basking sharks. The reliance on aerial surveys leads to a substantial detection bias, particularly given the conditions in the Atlantic. This methodology likely underrepresents their presence, especially when contrasted with land-based observations that indicate these waters are used frequently by the species. The failure to integrate or appropriately consider such information contributes to an incomplete baseline and diminishes the credibility of the findings.

These methodological weaknesses result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the requirements established under the Environmental Impact Assessment regime and the National Planning Framework 4, as the necessary identification and assessment of protected species have not been conducted appropriately. The uncertainty generated 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 unsupported conclusions leads to an unreliable assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and highlight the overall lack of a sufficient evidential foundation for the application.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity lacks depth and fails to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising heritage as an evolving aspect of community life, the application adopts a reductive approach that treats it as a collection of static, isolated assets.

A notable shortcoming is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment categorises them merely as static features. This oversight neglects their ongoing use and significance, as well as the impact that development could have on their surroundings. As a result, the evaluation of cultural effects remains incomplete and fails to consider their importance within community life.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language and local traditions, which are integral to the area's identity. The absence of these elements signifies a critical omission, as understanding the cultural impact of the development requires consideration of these intangible factors.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not adhere to established principles of participation in decisions impacting cultural and environmental interests.

Furthermore, there is a significant procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic implications for the island community, rendering a lawful determination unachievable.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, particularly regarding the safeguarding of historic assets and sites. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, indicates a clear deviation from policy requirements.

In summary, the collective failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately examined, and the application does not offer a sufficient foundation for understanding the true cultural cost associated with the proposal.

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

I object to this project on the basis of the protection of our indigenous island community and wildlife.

Yours faithfully,

[Redacted]

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A002F601

Member of the public 1674

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential elements and does not offer a comprehensive, transparent, or dependable account of the likely environmental consequences of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment and leading to a situation where the impacts outlined may not correspond to the actual development constructed. As a result, both the public and the competent authority are left without a true understanding of the potential environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that any environmental harm will be mitigated later prevents a thorough evaluation of the effectiveness of these measures and an assessment of any residual impacts. This deferral of critical information to post-consent phases is procedurally improper and conflicts with the core objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly established prior to any determination.

Further complicating the situation are substantial evidential deficiencies, such as gaps in baseline data, limitations within the methodology employed, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not meet the evidential standards stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly with regard to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in terms of biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information provided.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment represents a significant evidential gap that undermines the entire evaluation process for this development. While the developer engaged local residents through focus groups, the lack of

transparency concerning the findings prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research. Existing summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and should not be dismissed as speculative; however, without access to the complete assessment, the findings cannot be properly scrutinised, limiting their significance in the decision-making process.

Furthermore, there is a perception among residents that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this critical insight, these impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, preventing a comprehensive understanding of its implications.

This lack of transparency also compromises the Environmental Impact Assessment process. An accurate assessment of social, economic, and health impacts is crucial for developments of this scale, especially when community character and functioning may be affected. Without the complete dataset, the application fails to provide a thorough evidential basis for evaluating the balance between benefits and harm. From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should support positive health outcomes and avoid harm; however, the available evidence suggests existing adverse effects that have not been fully disclosed. Consequently, compliance with this policy cannot be established in the absence of the full assessment.

The procedural implications of this situation are serious. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment regime is concerning. Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the evaluation incomplete and unreliable, hindering lawful determination and highlighting that the application is not backed by sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is significantly lacking and does not include the necessary details to adequately evaluate potential environmental impacts. There is a proposed undertaking of substantial seabed preparation and installation work in a high-energy Atlantic environment; however, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be established after consent has been granted, which hampers any meaningful assessment of their potential effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the environment it affects. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to sediment disruption and pollution. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not supply adequate information on how these risks will be prevented, managed, or monitored.

Moreover, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential repercussions for marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not adequately account for the full range of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected; however, their separate assessments lead to a disjointed evaluation, obscuring the true magnitude of environmental and socio-economic consequences.

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

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

The lack of consideration for onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The disjointed evaluation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully realised. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been considered, creating a significant evidential void regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. This issue has not been adequately addressed by the application, nor has it been shown that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is inconsistent 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. Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus obstructing a lawful determination.

TOURISM

The assessment of tourism impacts is significantly lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, thus supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of seascape industrialisation and environmental quality degradation on Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it is impossible to ascertain whether the development would yield a net

economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment overlooks the critical role of environmental quality in promoting tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, resulting in a considerable gap in understanding the implications for a recognised and growing segment of the local economy.

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

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

In summary, the inability to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This inadequacy hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally unfit for determination due to significant procedural and substantive shortcomings. There is a clear lack of a comprehensive evidential basis, marked by critical gaps in baseline data and the continued use of an undefined design envelope. The reliance on unspecified mitigation measures, along with the omission of vital impact pathways such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This absence of reliable information does not allow for a proper understanding of the likely significant effects or residual impacts.

Moreover, the absence of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a serious omission. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, further underscoring the application’s inadequacies.

The proposal stands in direct opposition to National Planning Framework 4, failing to demonstrate sufficient protection of biodiversity, natural places, and cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, largely due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been assessed appropriately, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals lead to inconsistencies that have not met the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing any lawful conclusion that impacts may be acceptable.

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

In summary, the extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, make the application untenable. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

Member of the public 1675

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 regimes. A thorough review of the Environmental Impact Assessment Report and supporting documentation has identified several significant deficiencies in material planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a significant absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key aspects of the proposal remain ill-defined. The use of a flexible design framework obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the available documentation fails to offer a comprehensive or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are evident and substantive conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests required for consent, thus undermining the ability of the competent authority to deem the development acceptable within policy parameters.

The scale of this proposal is unprecedented for the location, with large turbines positioned close to the shoreline. This raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that compromise its reliability and transparency regarding the potential environmental

effects of the proposal. A key issue arises from the application of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and obstructs a consistent application of a worst-case scenario, thereby undermining the assessment's integrity and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have not been clearly defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferral of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

Additionally, significant gaps exist in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the application presents conclusions of negligible or non-significant effects devoid of robust supporting data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal further fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it does not provide assurance that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies prevent a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determinate decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is fundamentally deficient and fails to satisfy the legal obligations of the Environmental Impact Assessment framework. Instead of offering a structured and reasoned analysis of viable alternatives grounded in environmental consequences, the documentation merely recounts the evolution of the project. This narrative fails to adequately demonstrate that less harmful options have been thoroughly identified, evaluated, and chosen over more detrimental solutions.

Furthermore, there is a lack of transparent, evidence-based comparisons concerning alternative offshore sites, development sizes, or design layouts. Notably, the application does not indicate that the developer has genuinely considered placing turbines further offshore, a move that would likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the critical relevance of proximity to the shore in assessing impact, necessitates such an analysis; its absence undermines any assertion that the proposed siting constitutes the least damaging option.

This inadequacy is also reflected in the assessment of cable routing and landfall, where there is a failure to provide sufficient evidence that alternative routes have been meaningfully investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a coherent avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been adequately considered, relying instead on measures to be implemented after the design phase.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through considerations of site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be established that the proposal aligns with sustainable or policy-compliant standards.

From a policy standpoint, this inadequacy jeopardises adherence to National Planning Framework 4, particularly concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative evaluation is a significant oversight that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

absence of significant effects on otters.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment inadequately addresses cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising heritage as an evolving entity with social, cultural, and spiritual significance, the application simplifies it into isolated, static assets.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places for burial and spiritual practice. The assessment categorises these sites as static features, ignoring their continued relevance and the impact that development could have on their settings. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Furthermore, the assessment fails to account for intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity

yet are completely overlooked, which represents a significant gap in the analysis. Without considering these aspects, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as Indigenous, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and disregards well-established principles that emphasise participation in decisions impacting cultural and environmental matters.

Moreover, a critical procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment obstructs the competent authority from fulfilling its legal obligation to evaluate social, cultural, and economic impacts on the island community. This alone undermines the lawfulness of the determination.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices clearly diverge from required policy standards.

Collectively, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to offer a robust foundation for understanding the genuine cultural cost associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with this application is significantly lacking in transparency and is therefore not compliant with legal requirements. Although the developer has commissioned a Social Impact Assessment that involved focus groups with local residents, the complete report has not been made available to the public. This absence creates a considerable evidential gap, limiting both public understanding and the capacity of the competent authority to fully assess the social risks highlighted in the developer's own research.

Summaries that are available reveal that local residents are already experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These findings stem from direct community engagement and should be taken seriously rather than dismissed as speculation. However, the lack of access to the comprehensive assessment hampers proper scrutiny of these findings and obstructs a thorough evaluation of their importance in the decision-making process.

Moreover, there is documented evidence suggesting that the proposal is viewed as a

direct threat to the community's identity and cohesion, with "cultural loss" explicitly mentioned in the developer's own findings. These adverse impacts have not been adequately considered in the main application, nor have they been given the necessary weight in the assessment. The withholding of the full Social Impact Assessment obscures the actual social and human costs of the proposed development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health repercussions is essential for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a full evidential basis to evaluate the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and mitigate any harm; however, the evidence available suggests the presence of adverse effects that have not been fully disclosed. Without the complete assessment, there can be no demonstration of compliance with this policy.

The implications of these procedural shortcomings are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material failure within the application and does not meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with existing evidence of adverse effects, leads to an incomplete and unreliable evaluation. This situation precludes a lawful determination and further reinforces the argument that the application lacks sufficient information to proceed.

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 result in a dominant industrial presence, fundamentally transforming this character and causing a permanent alteration to the landscape. The assessment presented fails to represent the scale of this visual change adequately, as the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, adversely impacting visual amenity and eroding the naturalness and remoteness of the area.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively capture the most sensitive receptors or potential worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, thereby undermining the assessment's

reliability.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently explored. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, which is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment neglects their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connections to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change threatens the safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a rigorous worst-case assessment calls into question any claims 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 overwhelming and inescapable. Consequently, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment is inadequate in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial works on the seabed in a high-energy Atlantic environment, yet the assessment of construction and pollution risks is incomplete. It lacks the necessary detail to evaluate the likely environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises particular concerns given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. The application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, but it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

There is also uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

The absence of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application makes it difficult to evaluate whether appropriate safeguards are in place to respond to pollution events. This creates procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory perspective, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be assessed before consent, and without this information, a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling over a prolonged period is expected to disturb marine life over extensive

distances, particularly impacting species like dolphins. There are serious concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population. However, the application downplays these effects and lacks adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of onshore infrastructure, leaving a significant evidential gap regarding the project’s overall environmental footprint. This project encompasses both offshore turbines and onshore works, which are intrinsically linked but have been assessed separately. Such a fragmented approach obscures the true scale of the environmental and socio-economic effects, particularly concerning the impacts on sensitive habitats and communities.

Key onshore elements include the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, all of which traverse sensitive landscapes. Excavation across deep peat areas, especially within Barvas Moor—an ecologically significant habitat and vital carbon store—has not been adequately evaluated. The lack of a full assessment prevents a proper understanding of cumulative effects and undermines the Environmental Impact Assessment process, which mandates that all components of a project be considered together.

The proposal raises critical concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the

aims of renewable energy initiatives. Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights, as the application does not provide evidence of necessary consents or processes, thereby calling into question the deliverability of the project.

In terms of policy compliance, the failure to assess the project as a cohesive whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with established frameworks such as the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts on sensitive habitats have been fully assessed, or that adequate avoidance measures are in place, diminishes the reliability of the application. Ultimately, the separation of project components, alongside the absence of a thorough assessment, renders this part of the application incomplete and unfit for lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism value. However, the proposal introduces permanent red aviation lighting that will create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This is particularly concerning given the rising importance of dark skies to the identity of the area and the emerging tourism sector centred around astro-tourism.

Moreover, the application neglects to assess the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The absence of a lighting impact assessment or phototaxis study means that the application does not consider how aviation lighting may negatively affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or related risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard to exclude any adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission contradicts National Planning Framework 4,

which pertains to the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a crucial component of the ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant deficiencies that undermine its alignment with sustainable development principles. It echoes the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a primary issue. Despite being submitted under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application fails to adequately address these crucial aspects.

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

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

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

Uncertainties regarding environmental risks persist, particularly in relation to marine ecology, seabirds, protected species, and marine mammals. The assessments are incomplete and, in certain areas, inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle. This failure to meet

evidential standards prevents the conclusion that impacts are acceptable.

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

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

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

Additional Comments

Why so close to the shore? A fast buck for a few.

Yours faithfully,

[Redacted]

Member of the public 1676

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not deliver a complete, transparent, or reliable analysis of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to defined turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the application of a worst-case scenario. This deficiency undermines the assessment's integrity, resulting in a situation where the impacts outlined may not represent the actual development built. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

The application leans significantly on mitigation measures, monitoring strategies, and management plans that remain unspecified. Seeking consent under the assumption that environmental harm will be addressed later obstructs a meaningful evaluation of their effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are also notable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such gaps lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without solid supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing a scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not meet the evidential standards established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that suitable safeguards are in place.

When considered collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These flaws obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to reach a decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to its materially inadequate assessment of alternatives. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been

properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The significance of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of such analysis hinders any conclusion that the proposed siting is the least damaging option.

The shortcomings also extend to the assessments of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been applied, with undue reliance instead placed on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species contains significant deficiencies that compromise its reliability and completeness, particularly concerning the West Lewis coastal environment. This marine system is known to be biologically active and sensitive, yet the data collected is incomplete, and the methodologies used fall short in adequately capturing species presence, behaviour, and habitat usage. Consequently, the evaluation lacks a solid evidential basis for understanding potential impacts.

Among the critical oversights is the treatment of otters, a species protected under European law. The application does not sufficiently recognise or assess their active use of coastal regions for foraging and movement. Ignoring their core foraging range and behavioural patterns means that the implications of construction-related disturbances, noise, and increased activity remain inadequately evaluated. This oversight undermines any claims regarding the lack of significant impacts on this species.

Furthermore, the assessment of basking sharks demonstrates additional shortcomings. The reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic weather conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that highlight their frequent use of these waters. The failure to consider such data properly contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws indicate that conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The absence of sufficient baseline data hampers meaningful evaluations of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This introduces uncertainty about the actual risk levels faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. This uncertainty prevents the dismissal of adverse effects with reasonable scientific assurance, necessitating the application of the precautionary principle. Under these circumstances, it would not be lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its findings. The development is situated within critical foraging areas and migratory routes, yet the application does not adequately evaluate the potential effects of habitat loss, collision risk, or displacement on seabird populations. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application does not convincingly demonstrate that these species will not be adversely impacted.

There exists a notable contradiction within the application, as the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment and suggests that the conclusions drawn lack solid support from the evidence provided. Furthermore, the assessment fails to substantiate that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected, with the importance of their feeding

grounds inadequately addressed. The reliance on modelling methods adds uncertainty, particularly for species facing severe declines like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly due to incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor introduces significant risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently explore the long-term consequences of sustained mortality within this corridor or the impact on species with small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to affirm no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling weaknesses means the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify a lack of compliance with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy. Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not fulfill the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the planning application inadequately addresses the cultural heritage and identity of the West Lewis coastline. This area is a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application treats heritage as a collection of static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is seen in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are places of active burial and spiritual practice, yet the assessment reduces them to static features, ignoring their continued use and significance. This mischaracterisation leads to an incomplete evaluation of cultural impacts and neglects their importance in community life.

Moreover, the application does not assess intangible cultural heritage, which includes the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity, but they are missing from the assessment, which is a substantial oversight. The absence of these considerations prevents a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking

population has a distinct cultural identity and is recognised as an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

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

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not adequately support an assessment of the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment is a serious concern that compromises the integrity of the application. The developer conducted focus groups with local residents as part of the assessment, yet the full report has not been made available. This lack of transparency creates a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate the social risks that have been identified.

Available summaries indicate that local residents are already experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These documented impacts arise from direct engagement and therefore should not be viewed as speculative. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal poses a threat to community identity and cohesion, with the developer's own findings indicating a risk of "cultural loss." Despite this, these identified impacts have not been adequately incorporated into the main application or given the necessary weight in the assessment. The withholding of 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. A thorough understanding of the social, economic, and health implications is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset means that the application fails to provide a comprehensive evidential basis for balancing benefits against potential harm.

From a policy standpoint, the application does not appear to comply with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and avoid negative impacts, yet the evidence suggests that adverse effects are already present and have not been fully disclosed. Without the complete assessment, the demonstration of compliance with this policy is unsubstantiated.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a material flaw within the application and fails to meet the evidential requirements outlined in the Environmental Impact Assessment framework.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, seascape, and landscape impacts is critically inadequate and fails to reflect both the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. Introducing large-scale turbines near the shoreline would establish a continuous industrial presence, fundamentally altering this character and resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately portray the extent of the visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact in relation to such a sensitive landscape.

There are methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests that the magnitude of visual impact could be understated, which calls into question the reliability of the assessment.

Moreover, the assessment overlooks the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these critical connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This situation represents not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently assessed.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in its commitment to protecting natural spaces and historic assets. The scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

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

This dependence on undefined future measures raises serious concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these risks.

Moreover, there is considerable uncertainty regarding the scale and behaviour of

sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also affects potential consequences for marine species and habitats that have already been recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application obstructs an evaluation of whether appropriate safeguards are established to manage pollution incidents. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant likely effects and mitigation measures must be assessed before consent is granted, and the absence of such information renders a lawful determination unachievable. Additionally, the application does not demonstrate compliance with policy requirements associated with environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These issues inhibit a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of sufficient assessment regarding 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 diverse marine ecosystem and a thriving fishing industry. However, the proposal does not adequately show that these critical uses and habitats can be safeguarded or sustained without significant disruption.

A major flaw lies in the assumption that fishing activity can be displaced without adverse effects. The application does not provide any evidence that alternative fishing grounds are available, accessible, or able to support the additional pressure that displacement would create. This is a crucial oversight, as such 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 effects on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries substantial risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy hammer piling over an extended period is likely to disturb marine life across large areas, significantly impacting species like dolphins. The application's predictions regarding disturbance to a considerable proportion of the local bottlenose dolphin population are

alarming; yet, the significance of these impacts is downplayed without adequate supporting evidence.

There exists a clear inconsistency in the application, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to such a degree that legal authorisation is needed.

Additionally, the assessment neglects to account for cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these cumulative effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines and the related onshore infrastructure is significantly incomplete, resulting in a failure to recognise the full extent of impacts arising from what constitutes a single integrated project. The onshore components, which encompass cabling across protected moorland and the construction of a substation near Stornoway, are fundamentally interconnected with the offshore elements. By treating these components separately, a fragmented approach is adopted that obscures the true scale of the environmental and socio-economic effects involved.

Excavation works are planned across areas of deep peat, particularly in Barvas Moor, an ecologically sensitive habitat and notable carbon store. The application lacks a comprehensive assessment of the impacts associated with these onshore activities, thereby preventing a complete understanding of the project's overall environmental footprint. Additionally, the exclusion or deferral of assessment regarding onshore impacts hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered collectively; the failure to do so means the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not satisfactorily demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place. This indicates a significant evidential gap concerning biodiversity protection.

Concerns also arise relating to carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or provide evidence that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land brings potential conflicts with existing land use and legal rights. The lack of evidence that the requisite consents or processes have been initiated raises doubts regarding the project's deliverability and lawful implementation.

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

In summary, the separation of project components, the absence of a thorough assessment, and the lack of evidential support 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 absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The introduction of permanent red aviation lighting, which would be visible over extensive distances, creates an intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment of the West Lewis coastline, an area renowned for its exceptionally dark skies, which are vital to its environmental quality, cultural identity, and tourism value.

Notably, the application neglects to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning in light of the growing importance of dark skies to the area’s identity and sectors such as astro-tourism. The lack of consideration for these impacts highlights a significant gap in the overall landscape and environmental assessment.

Moreover, there is a critical failure to assess the 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 phototaxis, which can disorient them and heighten collision risks. The application omits any lighting impact assessment or phototaxis study, failing to address how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment exacerbates this issue, as it does not capture nocturnal activity or the associated risks. For instance, Kittiwakes, which might forage or migrate at night, are vulnerable to disorientation from artificial lighting. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a comprehensive assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, 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. Additionally, it undermines the wider assessment of landscape and seascape impacts, as the character of night-time is an integral part of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife constitutes a major deficiency. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, 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 application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the standards of sustainable development as required by statutory duties and national policy. It mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to address these critical areas adequately.

A major concern is the lack of a complete and reliable evidential basis for the application. There are significant gaps in baseline data, an undefined design envelope is still in use, and there is a heavy reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural failures are evident in the application as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Furthermore, the proposal contradicts the National Planning Framework 4, lacking

evidence for the protection of biodiversity, natural areas, and cultural heritage. It does not demonstrate that the impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact assessments. The cumulative impacts of both offshore and onshore components have not been appropriately evaluated, leading to a lack of clarity regarding the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion regarding the acceptability of the impacts.

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

In summary, the application presents both procedural and substantive deficiencies that render it unfit for determination. The extent of the informational gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

Scotland are producing enough natural power for the UK. It's time to leave our special environments and beautiful country alone now.

Yours faithfully,

[Redacted]

Member of the public 1677

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment requirements. The basis of this objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The size, location, and design of the wind farm present serious issues regarding their compliance with statutory obligations, national policies, and the overarching principles of sustainable development.

The application is fundamentally flawed due to its failure to present sufficient evidence for a lawful decision. Notably, essential environmental data is absent, baseline information provided is limited and inconsistent, and crucial elements of the proposal lack clear definition. The flexible design framework used raises doubts about the understanding of significant impacts, while the reliance on unspecified mitigation strategies hampers any assessment of their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts lack credible substantiation.

Additionally, the application reveals substantial conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. There is no evidence to demonstrate that national obligations regarding the protection of biodiversity, climate considerations, and environmental integrity can be fulfilled. These inconsistencies directly affect the statutory tests necessary for consent, thereby compromising the capability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposed development raises further concerns, with large turbines positioned unnervingly close to the shore, leading to significant worries about landscape capacity, visual impact, and environmental consequences. In light of the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and does not support a lawful decision. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not provide a full or reliable account of the likely environmental effects of the proposal. It employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent assessment of worst-case scenarios. As a result, the integrity of the assessment is undermined, leaving both the public and the competent authority unable to grasp the true extent of environmental effects.

Consent for the application is sought based on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach postpones the evaluation of environmental harm, which prevents any meaningful assessment of effectiveness or residual impacts. Deferring key information to post-consent stages is procedurally inappropriate and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also considerable evidential gaps, including insufficient baseline data and methodological limitations, along with reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are concluded without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory requirements.

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

The combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, leading to an incomplete and unreliable understanding of ecological receptors. This area, known for its biological activity and sensitivity, is not adequately represented by the baseline data provided. The

methodologies employed fail to effectively capture the presence, behaviour, and habitat utilisation of crucial species. Consequently, the assessment falls short of offering a solid evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a species protected under European law, which are not sufficiently acknowledged in their use of coastal regions for foraging and movement. The assessment does not adequately consider their core foraging range and behavioural patterns. This oversight raises concerns about the evaluation of potential construction disturbances, noise, and increased activity, leaving the conclusions regarding the absence of significant effects on otters unsubstantiated.

Additionally, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduce considerable detection bias, especially in the prevailing Atlantic conditions. This method is likely to underestimate the presence of these sharks compared to established land-based observations that reveal frequent utilisation of the waters. Such omissions lead to an incomplete baseline and compromise the reliability of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data hinders meaningful assessments of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation creates uncertainty about the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and evaluate protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the invocation of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the assessment's unreliability stems from incomplete baseline data, inadequate methodologies, and unsupported conclusions. These critical flaws obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability and adherence to regulatory standards. It indicates that the west coast of the Isle of Lewis, home to internationally important seabird populations, is not adequately protected. Many of these species are already in decline, yet the application fails to provide sufficient evidence that their interests will not be adversely impacted. The turbines are sited within vital foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss remain poorly evaluated.

A critical inconsistency undermines the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated, calling the credibility of the assessment into question. Furthermore, the application does not convincingly demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling approaches adds uncertainty, especially for vulnerable species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognized migratory corridor poses an additional risk by effectively obstructing a primary flight path utilized by species migrating between the United Kingdom and Iceland. The assessment fails to thoroughly consider the long-term consequences of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, preventing a lawful conclusion in favour of consent.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to show that internationally significant seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is fundamentally flawed due to internal inconsistencies, methodological shortcomings, and insufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is deeply flawed, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The application adopts an overly simplistic perspective, treating heritage as a set of isolated, unchanging assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the handling of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are characterised as static elements, disregarding their continued usage, meaning, and the potential impacts of development

on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance in community life.

Intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment, is also ignored in the assessment. These elements are vital to the area's identity but are entirely omitted, indicating a significant gap in understanding the cultural impact of the development.

There are additional concerns related to community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity recognised as having characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental matters.

Moreover, a critical procedural flaw exists in the failure to produce a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to legally evaluate the social, cultural, and economic effects on the island community. This omission is sufficient to render the determination unlawful.

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

In conclusion, the combined failure to evaluate living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application fails to provide a robust basis for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it

relies on mitigation and contingency measures that are to be defined post-consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures raises considerable concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application recognises 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.

There exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application undermines the ability to evaluate whether adequate safeguards are in place to address pollution incidents. This introduces procedural risk and compromises the capacity of the competent authority to assess environmental protection measures effectively at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be assessed prior to granting consent; 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 summary, the absence of well-defined mitigation measures, inadequate management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding the impacts on fisheries and marine life is inadequate and fails to present a thorough evaluation of both ecological and socio-economic consequences. The waters along the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry. However, the application does not adequately demonstrate how these activities and habitats can be preserved or maintained without significant disruption.

A notable concern is the presumption that fishing activities can simply be shifted

without repercussions. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can handle increased pressure. This gap is crucial, as the risk of overfishing in other areas could arise, potentially leading to broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, understanding the effects on fisheries and livelihoods remains incomplete.

Furthermore, the proposal presents significant risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling for extended durations is expected to create disturbances over considerable distances, impacting species such as dolphins. The predicted disruption to a large segment of the local bottlenose dolphin population raises important issues, yet the application minimizes the seriousness of these effects without adequate supporting evidence.

There is also a striking inconsistency within the application, as it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously describing those impacts as negligible. This contradiction undermines the trustworthiness of the assessment and raises issues related to adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal permission.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. In the absence of a thorough evaluation of these combined effects, it is impossible to ascertain the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can exist alongside current marine users or avoid unacceptable consequences for marine biodiversity, which hinders the conclusion that the proposal embodies sustainable development.

When considered as a whole, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment both incomplete and unreliable. These shortcomings impede a thorough evaluation of the repercussions for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and

the development of access routes through sensitive landscapes. Such activities include excavation in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

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

There are also serious concerns about carbon balance stemming from this proposal. The disturbance of peatland can release carbon that has been stored, potentially incurring a carbon debt that contradicts the fundamental goals of renewable energy initiatives. The application falls short in addressing this critical issue, failing to show that the overall carbon balance is indeed favourable.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area’s environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment neglects any examination of dark skies and nocturnal wildlife, marking a substantial omission. The proposed development includes permanent red aviation lighting that would be visible over long distances, leading to a continuous and intrusive "wall of light" effect across the western horizon. This alteration would fundamentally change the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of assessment is particularly concerning given the growing importance of dark skies to local identity and emerging sectors like astro-tourism. Consequently, there is a significant gap in the overall assessment of the landscape and environment.

Moreover, the proposal does not address potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the application fails to consider how aviation lighting may impact these species or contribute to mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, for example, may forage or migrate at night and are also at risk of disorientation caused by artificial lighting, yet this risk has not been investigated. The lack of site-specific night-time data leads to a critical deficiency in understanding ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites could face adverse impacts. The evidential standard required to exclude potential adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and hindering lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4's guidelines regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a crucial aspect of the overall environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis indicates that the application 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 fails to meet the criteria for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. It mirrors the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application comes under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is a concerning lack of a comprehensive and reliable evidential basis for the application. Key data is missing, the design envelope remains undefined, and unspecified mitigation measures rely on assumptions rather than concrete plans. Furthermore, vital impact pathways, such as effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have not been addressed.

Consequently, the Environmental Impact Assessment is inadequate, failing to elucidate the likely significant effects or residual impacts.

The process surrounding this proposal is also flawed. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for approval.

In addition, the proposal contradicts National Planning Framework 4 by not adequately protecting biodiversity, natural areas, or cultural heritage. It does not demonstrate 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 both offshore and onshore components have not been thoroughly evaluated, leaving uncertainties regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain ambiguous and potentially substantial. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidence provided does not meet the threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and complicating any lawful conclusion regarding acceptable impacts.

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

In summary, the application is fundamentally flawed both procedurally and substantively, with significant deficiencies in information, conflicts with policy, and unresolved environmental risks. These factors hinder the ability to make a lawful, evidence-based decision. The competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or to invoke regulatory provisions to obtain the missing information.

Additional Comments

This is being done for all the wrong reasons and any majority benefit will not be for this island. Monetary ‘compensation’ is scant substitution for permanently altering and damaging a landscape that has served as a unique location in a world being consistently ruined for money. Let the islanders keep their island as it is. The knock on effects will be hugely significant - long and short term. Wildlife, marine life, impact on local people and way of life - everything will change and once you take that from us it is gone. And for what? Money? Greed? Because this isn’t being done in islanders best interests. There is huge opposition to this and so this should take precedent over any

other decision. Don’t do it. We are uniquely placed and our island will be tainted forever, both visually and as a result of the damage this will do to our communities, wildlife, marine life and so much more. This cannot be allowed to happen in this day and age.

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: 9B5AA1CF

Member of the public 1678

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an assessment of the Environmental Impact Assessment Report and associated documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. Situated off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. The design, scale, and proximity of the wind farm proposal raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents missing critical environmental data, limited and inconsistent baseline information, and unclear aspects of the proposal. The flexible design framework inhibits a proper understanding of the likely significant effects, and the unspecified mitigation measures raise doubts about their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which lack robust supporting evidence.

There are evident and serious conflicts with policy. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability from a policy perspective.

The scale of this proposal is unprecedented for the location, with large turbines planned in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application heavily relies on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach seeks consent based on the premise that any environmental harm will be addressed post-consent, which obstructs a thorough evaluation of their effectiveness or the assessment of residual impacts. Such deferral of essential information to later stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Additionally, the Environmental Impact Assessment Report is materially deficient, lacking a full, transparent, or reliable account of the proposal's likely environmental effects. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, injects significant uncertainty into the assessment process. This ambiguity undermines the integrity of the evaluation and means that the impacts presented may not correspond to the actual development, thus inhibiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The report also presents significant evidential deficiencies. There are noticeable gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including the need for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that suitable safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of delivering a systematic and reasoned evaluation of viable alternatives based on their environmental

impacts, the submission merely recounts the project's development history. This narrative approach does not sufficiently demonstrate that less harmful options have been properly identified, evaluated, and chosen over more damaging solutions.

There is a conspicuous lack of transparent and evidence-based comparisons regarding potential offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered positioning turbines further offshore, where impacts on visual aesthetics, ecology, and coastal areas would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role that distance from the shore plays in impact assessment, the absence of such an analysis precludes any determination that the proposed siting is the least harmful option available.

Moreover, the shortcomings extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The lack of a clear avoidance strategy and absence of comparative analysis point to a failure to implement mitigation by design, relying instead on measures that are applied after the design phase.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy, inhibiting the competent authority from determining whether more appropriate and less harmful alternatives are available. Without a rigorous alternatives assessment, it is impossible to assert that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency also compromises adherence to National Planning Framework 4, particularly in relation to the protection of natural environments, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a material shortcoming that contributes to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Significant shortcomings arise in the evaluation of culturally important sites, including the cemeteries located at Dalmore, Bragar, and Barvas. These areas serve as active burial grounds and sites for spiritual practices, yet they are inaccurately classified as static features. This oversight neglects their current use, meaning, and the implications

of development on their surroundings. Such a mischaracterisation leads to a deficient understanding of cultural impacts and disregards the vital role these sites play in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development is fundamentally lacking in transparency and completeness, which are essential for a lawful evaluation. Although the developer engaged in a Social Impact Assessment and conducted focus groups with local residents, the absence of the full report creates a significant evidential gap. This lack of information restricts both public understanding and the competent authority's ability to gauge the full spectrum of social risks highlighted by the developer's own research.

Available summaries suggest that local residents are already facing measurable levels

of stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct community engagement and are not based on speculation. Nevertheless, the failure to release the complete assessment undermines thorough scrutiny of the findings and constrains the evaluation of their implications within the decision-making process.

Furthermore, there is notable evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with references to "cultural loss" featured in the developer's own findings. Despite this recognition, these critical impacts have not been adequately incorporated into the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs of the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functionality may be at stake. The failure to provide the full dataset means that the application does not present an adequate evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Development proposals are required to foster positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been thoroughly disclosed. Without access to the full assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the complete Social Impact Assessment. This omission represents a significant flaw within the application and constitutes a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, along with existing evidence of adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and further emphasises that the application is inadequately supported by sufficient information.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was identified. It is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical examination of the application reveals significant deficiencies in the evidential basis necessary for determination. There are notable gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and the exclusion of essential impact pathways such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of likely significant effects or residual impacts.

There are evident procedural shortcomings, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Uncertainties surrounding environmental risks remain, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to demonstrate that adverse effects are excluded beyond reasonable scientific doubt has not been fulfilled, which engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is both procedurally and substantively unsuitable for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the relevant regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 19038A8C

Member of the public 1679

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not sufficiently reflect the extent of change or the sensitivity of the

environment it addresses. The West Lewis coastline is characterised by an open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, fundamentally transforming this character and leading to a permanent alteration of the landscape.

The application falls short in representing the scale of the visual changes anticipated. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would detrimentally affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately convey the significance of these impacts within such a sensitive landscape context.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises concerns that the assessment may have understated the magnitude of visual impacts, thereby undermining its reliability.

Moreover, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation disregards their interdependence and results in an incomplete evaluation of impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these vital connections, changing the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The anticipated scale of change is at odds with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy requirements.

It is evident that the impacts identified cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Therefore, the anticipated changes are fundamentally permanent and cannot be reduced to an acceptable level through any mitigation measures.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism value. The proposed project would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the region's identity and the emerging tourism sector of astro-tourism, this omission is especially troubling.

Moreover, there is no evaluation of how this lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to examine how aviation lighting might impact these species or contribute to mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which does not capture nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts.

The failure to consider nocturnal impacts raises significant concerns about whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and thereby obstructing a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with the National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Furthermore, it undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits significant shortcomings that undermine its compliance with the principles of sustainable development as mandated by statutory duties and national policy. The application

mirrors the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing, it fails to address these critical issues adequately.

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

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

The proposal stands in opposition to National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It also fails to confirm that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, thus obscuring the impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

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: A4DF43E5

Member of the public 1680

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, as these factors call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals that the application does not provide an adequate evidential basis for lawful determination. Key environmental data is absent, baseline information appears limited and inconsistent, and several critical aspects of the proposal are not clearly defined. The use of a flexible design framework hampers understanding of likely significant effects, and reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation fails to facilitate a complete or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, there are distinct and substantive conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests required for consent and weaken the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, involving large turbines situated in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal poses a potential threat to community identity and cohesion, as indicated by the developer's own findings which highlight “cultural loss.” Despite this significant concern, the impacts have not been adequately incorporated into the main application or given the necessary consideration. The failure to disclose the full Social Impact Assessment obscures the true human and social cost associated with the development, creating an evidential gap that hinders public and authoritative understanding of the associated social risks.

Moreover, residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as revealed through direct engagement. These impacts are concrete rather than speculative, yet the non-disclosure of the complete assessment restricts proper scrutiny of the findings and limits the ability to ascertain their significance in the decision-making process. The assessment of social impacts, health, and wellbeing is deficient, lacking the transparency essential for a lawful evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm. However, the available evidence points to existing adverse effects that have not been fully addressed. Without the complete assessment, it is impossible to establish compliance with this policy.

The implications of this lack of transparency are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a significant omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

Ultimately, the combination of withheld information concerning the full Social Impact Assessment and the evidence of existing adverse impacts renders the overall assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and evidential benchmarks. This application mirrors the core issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Presenting this proposal under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify its inherent flaws.

There is a lack of a complete and reliable evidential basis for determination in the application. Critical gaps exist in the baseline data, and the use of an undefined design

envelope raises concerns. The reliance on unspecified mitigation measures and the omission of significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, further compromise the application. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the omission of the complete Social Impact Assessment represents a substantial gap in the information provided. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage. Furthermore, it fails to show that the health and wellbeing impacts are acceptable and cannot substantiate 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 sufficiently assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in several areas. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

When considered collectively, these procedural and substantive deficiencies render the application unfit for determination. The considerable information gaps, policy conflicts, and unresolved environmental risks prevent a lawful, evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C0FE6921

Member of the public 1681

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 regimes. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental impact, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly pristine environment, and a strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, particularly in relation to statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful decision. There is missing critical environmental data, and the baseline information presented is limited and inconsistent, leaving key aspects of the proposal undefined. The flexible design framework employed creates uncertainty regarding potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Furthermore, there are substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These policy discrepancies directly relate to the statutory tests required for consent and jeopardise the ability of the competent authority to determine that the development adheres to acceptable policy standards.

The unprecedented scale of the proposal raises substantial concerns regarding landscape capacity, visual dominance, and overall environmental impact, with large turbines positioned alarmingly close to the shoreline. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In such circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a transparent or reliable account of the potential environmental effects of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hampers the ability to consistently apply a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts described may not accurately represent the actual development, which hinders both public understanding and the competent authority's evaluation of the true environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent on the premise that environmental harm will be mitigated later prevents a thorough evaluation of effectiveness and residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which requires likely significant effects and mitigation to be established before determination.

There are also substantial evidential gaps, including missing baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

Consequently, the application does not satisfy the evidential standards set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it fails to show that impacts have been fully assessed or that proper safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These issues impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species demonstrates significant deficiencies, failing to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is incomplete. Moreover, the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species,

resulting in an assessment that lacks a solid evidential basis for evaluating potential impacts.

Notably, the application neglects to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduces substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider such critical data results in an incomplete baseline and undermines 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 hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development fails to meet the necessary evidential standards regarding the impact on ornithological factors, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. The application does not sufficiently demonstrate that these species will remain unaffected, despite being situated in key foraging areas and migratory pathways. There is a clear lack of robust evaluation regarding displacement, collision risk, or habitat loss, which raises concerns about the adequacy of the ornithological assessment.

There is a fundamental contradiction within the application, as the developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency undermines the reliability of the assessment and highlights the lack of support for its conclusions based on the available evidence.

Moreover, the assessment does not adequately address the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches introduces uncertainties, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional significant risk by creating a barrier along a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term implications of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory viewpoint, the application does not fulfil the evidential threshold needed to confirm no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, which prohibits a lawful conclusion in support of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment associated with this application is fundamentally flawed and overlooks the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising the ongoing social, cultural, and spiritual significance of heritage, the application takes a reductive stance, treating heritage as merely isolated, static assets.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for

burial and spiritual practices, yet the assessment wrongly categorises them as static features, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage, including the Gaelic language and traditions, along with the long-established relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely overlooked, representing a significant gap in understanding the cultural impact of the development.

There are serious concerns regarding community rights and engagement as well. The Gaelic-speaking population, possessing a unique cultural identity recognised as characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement diminishes the credibility of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

Crucially, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, violating statutory requirements under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community, rendering any determination unlawful.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, indicates a clear deviation from policy stipulations.

In summation, the lack of evaluation regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a significant evidential gap. The cultural ramifications of the development have not been adequately assessed, and the application lacks a robust foundation for appraising the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is troubling and undermines the Environmental Impact Assessment process. Although the developer engaged with local residents through focus groups, the full report has not been published, creating a significant evidential gap. This omission prevents both the public and the competent authority from grasping the complete extent of social risks identified by the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on

direct engagement rather than speculation. However, without access to the full assessment, it is impossible to properly scrutinise the findings or to ascertain their significance in the decision-making process.

Moreover, there is a perception that the proposal poses a direct threat to community identity and cohesion, with the developer's own findings noting “cultural loss.” Despite this acknowledgment, the impacts have not been adequately incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4, particularly regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm; however, existing adverse effects have not been thoroughly disclosed. The absence of the complete assessment means that compliance with this policy cannot be substantiated.

Procedurally, the implications are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which signifies a material omission and a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and highlights that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline presents a range of significant deficiencies in its assessment of seascape, landscape, and visual impacts. This area is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of such industrial elements in close proximity to the shoreline would result in a dominant presence that fundamentally transforms this character, leading to irreversible changes to the landscape.

A key issue is the inadequate representation of the visual impact of these turbines. Their scale and proximity threaten to dominate views from various residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and compromising the essential qualities of naturalness and remoteness. The current assessment does not convey the true extent or significance of this impact within the context of a sensitive landscape.

Moreover, there are serious methodological concerns regarding the choice and presentation of visual viewpoints. The evidence indicates that these viewpoints may not fully account for the most sensitive receptors or depict worst-case scenarios,

particularly concerning vital cultural heritage sites and high-value landscapes. This oversight raises doubts about the accuracy of the stated visual impact and undermines the assessment's overall reliability.

Additionally, the application neglects to evaluate the interconnections between landscape, seascape, and cultural heritage comprehensively. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are not viewed in the context of their wider landscape setting and visual relationships with the Atlantic horizon. Instead, they are treated as isolated entities, leading to an incomplete assessment of the impacts on their setting and cultural significance.

The proposed industrialisation would sever the connections that define these heritage assets, fundamentally altering the context in which they are experienced and disrupting their relationship with the natural horizon. This not only represents a visual impact but also indicates broader cultural and spatial harm that remains unassessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The scale of change presented is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment weakens any assertions of policy compliance.

Ultimately, the identified impacts are such that they cannot be effectively mitigated. The scale, height, and proximity of the turbines would render their presence overwhelming and unavoidable. Thus, the changes introduced are fundamental and permanent, incapable of being reduced to acceptable levels through any mitigation measures.

In summary, the overall assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and firmly support the conclusion that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is fundamentally lacking, failing to provide the necessary detail to evaluate the potential environmental impacts adequately. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that would only be developed after consent, which precludes any thorough evaluation of their effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly

given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not offer adequate detail on how these issues will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether suitable safeguards are in place to respond to pollution incidents. This approach introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant likely effects and mitigations must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Moreover, 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 regarding potential impacts collectively render the assessment materially deficient. These deficiencies impede a robust evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application raises serious concerns regarding the routing of infrastructure through active croft land, which introduces potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, leading to questions about the deliverability and lawful implementation of the project.

The assessment of onshore infrastructure is significantly incomplete, failing to recognise the interconnectedness of the offshore turbines and onshore works. This separation results in a fragmented approach that obscures the full scale of environmental and socio-economic impacts. The onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. Excavation is planned across areas of deep peat, particularly within Barvas Moor, which is both a significant

carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment hinders a full understanding of the overall environmental footprint of the project.

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards for sustainable development as required by statutory duties, national policy, and evidential standards. It revisits the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current application is presented under a policy framework that places a stronger emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for this application. There is incomplete baseline data, an undefined design envelope, unspecified reliance on mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. The Environmental Impact Assessment

is therefore inadequate, lacking the information necessary for a comprehensive understanding of significant effects or residual impacts.

Additionally, there are clear procedural issues. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the lack of a full 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.

The proposal is also at odds with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, masking their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and may be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively inadequate for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for the application or use the appropriate regulatory provisions to request the submission of the missing information.

A formal request is thus made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Yours faithfully,

[Redacted]

Member of the public 1682

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. The objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, revealing significant deficiencies related to planning, environmental impact, cultural considerations, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural heritage. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policies, and the principles of sustainable development due to its scale, proximity, and design.

A crucial issue is the inadequate evidential basis provided for a lawful assessment of the application. There are notable gaps in critical environmental data, while baseline information is both limited and inconsistent. Furthermore, important elements of the proposal remain undefined. The application employs a flexible design framework that hinders a clear comprehension of the potential significant effects, and it relies on unspecified mitigation measures, which precludes an evaluation of their effectiveness. Consequently, the documentation does not furnish a full or informed understanding of the impacts on environmental, cultural, or community aspects, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, the application presents clear and significant conflicts with established policy. 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 health and wellbeing. The proposal does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine whether the development is acceptable in policy terms.

The unprecedented scale of the proposal in this region, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of sustaining a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal is supported by an Environmental Impact Assessment Report that is materially deficient and does not present a comprehensive, transparent, or dependable account of the likely environmental effects. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This approach obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment and preventing both the public and the competent authority from grasping the true extent of environmental effects.

Additionally, the application depends heavily on undefined mitigation measures, monitoring strategies, and management plans. This means that consent is being sought on the basis that any potential environmental harm will be addressed at a later stage, hindering a meaningful evaluation of effectiveness or assessment of residual impacts. The deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly established prior to determination.

The report also suffers from significant evidential deficiencies, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information prevents a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

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

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and robust assessment of environmental effects, meaning that the competent authority is not adequately positioned to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to deliver a comprehensive

understanding of the ecological receptors in this sensitive marine area. This system is biologically vibrant, yet the baseline data remains inadequate, and the methodologies used are insufficient for accurately capturing species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application neglects to adequately acknowledge and assess their active utilisation of coastal regions for foraging and movement. This omission in evaluating their core foraging range and behavioural patterns results in an incomplete understanding of how construction disturbance, noise, and increased activity might affect them. This gap undermines any assertions regarding the absence of significant effects on this species.

Further issues emerge in the assessment of basking sharks, where dependence on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. Such an approach likely leads to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits a meaningful examination of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been accurately identified or assessed. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these concerns, granting consent would not be lawful.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant internal inconsistencies, methodological weaknesses, and gaps in evidence. It fails to demonstrate that internationally important seabird populations, which are already experiencing declines, will not be adversely affected. The west coast of the Isle of Lewis, known for its key foraging areas and migratory pathways, is significantly

impacted by the siting of turbines within a recognised migratory corridor. This creates a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland, and the application does not sufficiently assess the long-term implications of sustained mortality within this corridor.

Contradictions within the application further undermine its credibility. The developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which suggests that significant harm is expected. Such inconsistency raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are not adequately supported by the evidence provided.

Moreover, the assessment does not adequately address the impact on seabirds associated with protected sites like the Lewis Peatlands and St Kilda. The significance of these feeding grounds is insufficiently acknowledged, and reliance on modelling approaches adds uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain poorly understood.

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 deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and precludes a lawful conclusion that supports consent. The identified deficiencies also signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. Ultimately, the inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the overall conclusion is that the application does not fulfil the statutory requirements needed for determination, due to the unreliability of the assessment arising from its inherent inconsistencies, methodological flaws, and lack of sufficient evidence.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is significantly deficient, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are fundamentally intertwined. The application adopts an overly simplistic approach, viewing heritage as a collection of separate, unchanging assets, rather than recognising their continuous social, cultural, and spiritual roles within the community.

A major shortcoming is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites

and centres for spiritual practice, yet they are characterised as static elements in the assessment. This oversight neglects their ongoing significance, use, and the implications of development on their surroundings. Such a misrepresentation leads to an incomplete understanding of cultural impacts, disregarding their integral role in community life.

Additionally, the assessment overlooks the intangible aspects of cultural heritage, which encompass the Gaelic language, traditions, and the enduring relationship between the local community and the coastal environment. These components are vital to the area's identity, yet they are completely excluded from consideration, marking a considerable gap. Without addressing these elements, the true cultural impact of the proposed development remains unclear.

There are also serious concerns regarding community engagement and rights. The Gaelic-speaking population maintains a unique cultural identity recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in matters that affect cultural and environmental interests.

Moreover, a crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and spaces. The failure to take into account both tangible and intangible heritage, as well as to acknowledge living cultural practices, constitutes a clear violation of policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a substantial evidential void. The cultural ramifications of the proposed development have not been adequately examined, and the application fails to offer a solid foundation for determining the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly inadequate, failing to accurately portray the degree of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The addition of large-scale turbines in close proximity to the shore would create a persistent industrial presence, fundamentally changing this character and leading to an irreversible transformation of the landscape.

Moreover, the application does not sufficiently depict the extent of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of this impact within the context of such a sensitive landscape.

Concerns are also present regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact is understated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets without acknowledging their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, modifying the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not just a visual impact, but also a wider cultural and spatial damage that has not been properly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change is incompatible with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of onshore infrastructure, leaving a significant evidential gap regarding the project's overall environmental

footprint. This project encompasses both offshore turbines and onshore works, which are intrinsically linked but have been assessed separately. Such a fragmented approach obscures the true scale of the environmental and socio-economic effects, particularly concerning the impacts on sensitive habitats and communities.

Key onshore elements include the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, all of which traverse sensitive landscapes. Excavation across deep peat areas, especially within Barvas Moor—an ecologically significant habitat and vital carbon store—has not been adequately evaluated. The lack of a full assessment prevents a proper understanding of cumulative effects and undermines the Environmental Impact Assessment process, which mandates that all components of a project be considered together.

The proposal raises critical concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights, as the application does not provide evidence of necessary consents or processes, thereby calling into question the deliverability of the project.

In terms of policy compliance, the failure to assess the project as a cohesive whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with established frameworks such as the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts on sensitive habitats have been fully assessed, or that adequate avoidance measures are in place, diminishes the reliability of the application. Ultimately, the separation of project components, alongside the absence of a thorough assessment, renders this part of the application incomplete and unfit for lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development as outlined by statutory obligations, national policy, and evidential benchmarks. This application echoes the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Currently, it is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland preservation, landscape integrity, and community wellbeing.

A reliable evidential basis for this application is lacking. It contains critical gaps in baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of significant effects or residual impacts.

Additionally, there are evident procedural shortcomings. The lack of a compliant Island

Communities Impact Assessment constitutes a violation of the statutory requirements under the Islands (Scotland) Act 2018. Moreover, the failure to provide the complete Social Impact Assessment represents a significant omission. These shortcomings prevent the competent authority from adequately evaluating 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 fails to demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, 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 been insufficient, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, which engages the precautionary principle and inhibits a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

I am a regular visitor (annually) to the Western Isles.
I visit to enjoy its unspoiled and wild landscapes, for the culture and heritage, and also for the wildlife.
I fear my experiences - and those of many, many tourists - will be compromised by the creation of this massive off-shore windfarm.

Indeed, all my holidays are spent in Scotland's wild places.

And I am becoming increasingly dismayed at the encroachment on our wild spaces by these unsightly windfarms.

It appears Scotland is for sale to the highest bidder.

And I share the anger of many of the local communities bespoiled by these massive constructions - most often by foreign and overseas companies and interests - that none of the huge supposed benefits of these installations does anything to benefit the local communities in which they sit... The electricity is transported to the national grid and is sold on: miles from where it was generated (cue the massive Beauly -> Denny pylons that I also encountered in a recent visit to what was once a remote glen).

I also have concerns about the effects on birdlife, which I'm not convinced has been fully explored.

ALSO, these huge turbines have a natural lifespan (not all that long in the grand scheme of things), and I have never heard a definitive explanation regarding the decommissioning of this supposed "asset", or on the eventual resting place for the turbines that is sustainable and eco-friendly.

Yours faithfully,

[Redacted]