Member of the public 1770

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It is informed by an examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The project is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, relatively untouched environment, and rich cultural identity. Concerns arise from the proposal's scale, proximity to the shoreline, and design, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision. Key environmental data is absent, baseline information is inconsistent and limited, and several crucial elements of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to evaluate their efficacy. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and the assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Furthermore, there are evident and substantial conflicts with policy. The proposal seems 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 provide assurance that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly affect the statutory criteria required for consent and compromise the competent authority's ability to determine that the development is acceptable under policy frameworks.

The unprecedented scale of this proposal introduces large turbines positioned very near to the shoreline, raising major concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of adequate information, the reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a reliable account of the potential environmental effects of the proposed project. The approach of employing a flexible Project Design Envelope, which does not commit to precise turbine sizes, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity and means that the predicted impacts may not accurately reflect the development as it will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental impacts.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that any environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of their effectiveness or assessment of residual impacts. This deferral of essential information to stages post-consent is procedurally unacceptable and runs counter to the intentions of the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly identified prior to determination.

There are also substantial evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These issues yield uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if adequate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data result in the Environmental Impact Assessment Report being both unreliable and incomplete. These flaws inhibit a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, falling short of the statutory requirements set out by the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison based on environmental effects, it presents a narrative of the project's evolution. This approach does not demonstrate that less harmful options have been properly identified, assessed, and preferred over

more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The lack of consideration for placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts, is particularly concerning. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the omission of such analysis undermines any assertion that the proposed siting is the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored adequately to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, indicates that mitigation through design has not been considered, relying instead on post-design measures.

Consequently, the application does not 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, thus hindering the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this deficiency contradicts the principles outlined in National Planning Framework 4, particularly those concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant oversight, leading to the conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. There is a lack of complete and reliable understanding of ecological receptors, as the baseline data remains incomplete and the methodologies employed fail to adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not provide a sound evidential basis for evaluating impacts.

A significant shortcoming in this assessment is its failure to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are inadequately evaluated. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

The assessment also falls short in addressing basking sharks, where reliance on aerial surveys leads to substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on ornithological interests. The assessment presented is fundamentally flawed, exhibiting considerable gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide the required evidential assurance that these species will not be adversely affected. The turbines are positioned within key foraging areas and migratory pathways, yet the assessment does not thoroughly evaluate the implications of displacement, collision risk, or habitat loss.

A critical contradiction is evident in the application, as the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment does not adequately demonstrate that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds has not been fully considered, and the reliance on modelling approaches introduces uncertainty,

particularly for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may likely underestimate mortality, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional and substantial risk, effectively creating a barrier within a primary flight path utilized 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 have the potential effects on species with relatively small global populations been considered.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development presents significant shortcomings in the assessment of cultural heritage and community identity, particularly regarding the West Lewis coastline, which embodies a living cultural landscape. This landscape intricately weaves together environment, language, tradition, and community, yet the application reduces heritage to mere isolated, static assets, failing to acknowledge their dynamic social, cultural, and spiritual functions within the community.

A notable failure within the assessment is the handling of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places for spiritual practice, but the assessment incorrectly categorises them as static features. This oversight neglects their ongoing use, meaning, and the potential impact of development on their setting, resulting in an incomplete evaluation of cultural effects and an omission of their vital role in community life.

Moreover, the application does not address intangible cultural heritage, such as the Gaelic language and traditions, or the historical relationship between the community and the coastal environment. These elements are crucial to the area’s identity yet are

entirely overlooked in the assessment, which is a significant omission. Without including these factors, the true cultural impact of the development remains inadequately understood.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, recognised for its distinct cultural identity as Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and disregards established principles for participation in decisions that affect cultural and environmental interests.

Furthermore, there is a critical procedural gap due to the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering a lawful determination unattainable.

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

Overall, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application falls short of providing a robust basis for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available. This lack of transparency represents a significant evidential gap that hinders public understanding and prevents the competent authority from evaluating the full extent of social risks identified through the developer’s own research. Available summaries indicate that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and therefore cannot be regarded as speculative. However, the failure to publish the complete assessment stifles proper scrutiny of the findings and limits the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Despite this serious concern, these impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with

the development.

This absence of transparency undermines the entire Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this scale, especially when community character and functioning may be compromised. By failing to provide the complete dataset, the application lacks a solid evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must foster positive health outcomes and mitigate harm, yet the evidence presented suggests existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be established.

The procedural implications are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This material omission represents a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing negative impacts renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not properly reflect the scale of change or the sensitivity of the environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. The proposed large-scale turbines located near the shoreline would create an overwhelming industrial presence, fundamentally changing this character and resulting in a permanent transformation of the landscape.

The application fails to accurately represent the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not properly communicate the significance of these impacts within the context of such a sensitive landscape.

There are also concerns about the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which undermines the reliability of the assessment.

Another significant shortcoming is the lack of an evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. The Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets as separate entities, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and breaking their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been adequately assessed in the application, in addition to the visual impact.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of proposed changes is incompatible with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines claims of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures to address construction and pollution risks raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and the potential for accidental spills, it fails to provide adequate details regarding the prevention, control, or monitoring of these risks.

In addition, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies prevents a determination of the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to marine species and habitats that have already been identified as sensitive within the broader assessment.

The assessment is further compromised by the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are in place to address potential pollution events. This deferral introduces procedural risks and undermines the competent authority's ability to assess the environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Moreover, the application does not demonstrate compliance with existing policy requirements related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, thereby reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant shortcomings in its assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. There is a critical lack of evidence regarding the potential for fishing activities to be displaced without adverse consequences. Specifically, the application does not demonstrate the availability or accessibility of alternative fishing grounds that could sustain additional pressure, which raises concerns about the risk of overfishing in other areas and the economic repercussions for the local fishing fleet.

Furthermore, the proposal poses substantial risks to marine species due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances that affect a wide area, notably impacting local species such as dolphins. The predicted disturbance to a significant segment of the bottlenose dolphin population raises urgent concerns; however, the application minimises the importance of these effects, lacking sufficient evidence to support its claims.

The inconsistencies within the application are also troubling. While it acknowledges the necessity of licenses for any harm to European Protected Species, it simultaneously categorises these impacts as negligible. This contradiction calls into question the validity of the assessment and highlights potential non-compliance with the Habitats Regulations, particularly where harm is anticipated that may require legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without an integrated evaluation of these combined effects, it is

impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, thus precluding any conclusion that the proposal embodies sustainable development.

In summary, the deficiencies related to fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies result in an incomplete and unreliable assessment. These issues inhibit a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of onshore infrastructure, which fails to fully address the integrated nature of the project. The offshore turbines and associated onshore works are fundamentally linked, yet the current evaluation treats them separately, leading to an incomplete understanding of the environmental and socio-economic impacts.

The onshore works entail significant developments, such as cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities will involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As it stands, the application does not provide a thorough assessment of these impacts, thus failing to convey the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project must be considered collectively. However, the disjunction between offshore and onshore components leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policy. The application lacks sufficient evidence to show that these habitats have been thoroughly assessed or that suitable avoidance measures are in place, revealing a significant gap in biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland can release stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or to demonstrate that the overall carbon balance

remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with established land use and legal rights. The application does not present evidence indicating that the necessary consents or processes have been undertaken, thereby casting doubt on the project's deliverability and lawful execution.

From a policy standpoint, the inability to assess the project comprehensively and to show that peatlands, habitats, and land use interests are protected stands in contradiction to the National Marine Plan and National Planning Framework 4. The lack of evidence demonstrating that impacts can be avoided or mitigated further compromises the application.

In conclusion, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts lead to an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. The proposed development includes permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to consider these potential impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, the assessment neglects to consider the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The application lacks any lighting impact assessment or phototaxis study, thus failing to evaluate how aviation lighting may affect these species or increase their mortality rates.

The reliance on daytime survey data within the ornithological assessment further compounds this oversight, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting; however, this potential risk has not been assessed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, these omissions are inconsistent with National Planning Framework 4 concerning the protection of natural places and the maintenance of environmental quality. Additionally, the lack of assessment undermines the broader evaluation of landscape and seascape impacts, as the night-time character is integral to the environment.

In conclusion, the lack of evaluation regarding dark skies and nocturnal wildlife constitutes a serious evidential shortcoming. The deficiency in baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

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

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the extent of industrialisation was deemed unacceptable. Presenting the proposal under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify these concerns.

There are significant deficiencies in the evidential basis provided for the application. Critical gaps exist in baseline data, the design envelope remains undefined, reliance on unspecified mitigation measures is evident, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, which hinders a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are also apparent. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal is in direct opposition to National Planning Framework 4, failing to demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. It does not provide assurance that health and wellbeing impacts are acceptable and lacks tourism impact modelling to evidence a net economic benefit. Furthermore, the cumulative impact of both offshore and onshore components has not been properly assessed, which obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies in parts. The evidential threshold

necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 39449BBF

Member of the public 1771

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application. The proposal has been reviewed in light of the Environmental Impact Assessment Report and associated documents, revealing several material deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and strong cultural identity. Concerns regarding compatibility with statutory requirements and national policy arise from the scale, proximity, and design of the project, challenging the principles of sustainable development.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area is not only biologically

active but also highly sensitive, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species, which undermines the reliability of the assessment's conclusions regarding potential impacts.

One critical area of concern is the treatment of otters, a species protected under European law. The application neglects to adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. This oversight means that the effects of construction disturbances, noise, and increased activity on their core foraging areas have not been properly assessed, leading to a misrepresentation of potential significant impacts on this species.

Similarly, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduces considerable detection bias, particularly in the challenging Atlantic conditions. This methodological choice is likely to result in an underestimation of their presence, especially when contrasted with the more reliable land-based observations that indicate these waters are frequently used by basking sharks. By failing to adequately incorporate or consider such vital data, the assessment falls short, resulting in an incomplete baseline.

These methodological flaws mean that any conclusions drawn about negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of robust baseline data impedes a meaningful assessment of cumulative and indirect impacts, including those related to seasonal changes and broader ecosystem interactions. This leaves considerable uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth in the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed the protected species in the area. The uncertainties raised prevent a definitive exclusion of adverse effects, necessitating the application of the precautionary principle. In light of these issues, consent cannot be lawfully granted.

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies hinder a thorough evaluation of the impacts on marine ecology and protected species, thereby indicating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on seabirds is fundamentally flawed. It presents significant gaps in evidence and contains internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate adequately that these species will not be adversely affected. Key foraging areas and migratory pathways are situated near the

development, yet the assessment does not thoroughly evaluate risks related to displacement, collision, or habitat loss.

There is a critical contradiction within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously submit a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not backed by the evidence provided.

The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used may underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of risk. This placement effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and modelling flaws means that the required standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and renders the conclusion in support of consent unlawful.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These issues hinder a robust 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 West Lewis coastline should be recognised as a living cultural landscape, where environment, language, tradition, and community are intricately linked. However, the assessment of cultural heritage and community identity in the application is inadequate, adopting a simplistic view that treats heritage as isolated and static, rather than acknowledging its ongoing social, cultural, and spiritual functions within the

community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active burial sites, vital for spiritual practices, are inaccurately categorised as static features, neglecting their continued use and the potential impacts of development on their settings. This oversight leads to an incomplete evaluation of cultural effects, disregarding their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language and local traditions, alongside the community's long-standing connection to the coastal environment. These elements are central to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population represents a distinct cultural identity, akin to that of an Indigenous People; yet, the absence of a process for Free, Prior and Informed Consent undermines the credibility of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions affecting cultural and environmental interests.

A critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is required 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 effects on the island community. This omission alone is sufficient to prevent a lawful determination.

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

Overall, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sound basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration demonstrates significant deficiencies in the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the absence of the full report is a major evidential gap that hinders both public understanding and the authority's ability to grasp the extent of social risks identified by the developer’s own research.

Residents have reported experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as shown through direct engagement. The lack of access to the complete assessment obstructs proper scrutiny of these findings, thus limiting the capacity to ascertain their importance in the decision-making process. Furthermore, the proposal is perceived as a threat to community identity and cohesion, with indications of “cultural loss” emerging from the developer's findings. Despite this, such impacts have not been adequately considered in the main application or given the necessary weight. The failure to release the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and functionality may be at risk. By withholding the complete dataset, the application does not provide a comprehensive evidential basis necessary for weighing benefits against harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and prevent harm, yet the evidence available reveals existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to affirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation due to the lack of access to the complete Social Impact Assessment. This represents a material omission within the application and fails to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted on seascape, landscape, and visual impacts lacks sufficient detail and does not accurately reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. Introducing large-scale turbines near the shoreline would create an industrial presence that is both continuous and dominant, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately depict the extent of visual change. Given their scale and proximity, the turbines would dominate views from residential

areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not effectively convey the significance of this impact within such a sensitive landscape context.

Methodological issues also arise concerning how visual viewpoints were chosen and presented. Evidence suggests that some viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding critical cultural heritage sites and valued landscapes. This raises concerns that the visual impact's magnitude may have been understated, which in turn compromises the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are not isolated; they are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment fails to acknowledge this interdependence, leading to an incomplete understanding of the impacts on both their setting and cultural significance.

Industrialising the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This presents not just a visual issue, but also cultural and spatial harm that has not been sufficiently examined in the application.

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

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resultant change is therefore fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings prevent a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline features clean coastal waters and important habitats that are sensitive to disturbances and contamination. The assessment of construction and pollution risks associated with the proposed project is incomplete, lacking the necessary detail to properly evaluate the likely environmental effects. The proposal

includes substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be formulated after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

There are acknowledged risks in the application, such as sediment mobilisation and accidental chemical or oil spills, but it fails to provide enough detail on how these risks will be prevented, controlled, or monitored. Additionally, uncertainty surrounds the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive.

The absence of detailed emergency response procedures further complicates the issue. By postponing contingency planning until after consent, the application makes it impossible to evaluate whether proper safeguards are established to handle pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and required mitigations must be evaluated prior to granting consent; without this information, a lawful determination cannot be made. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts render the assessment materially deficient. These issues prevent 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 vibrant marine ecosystem and support a thriving fishing industry. However, the application does not adequately demonstrate how these essential uses and habitats can be preserved or sustained without causing significant disruption. There is a troubling presumption that fishing activities can simply be relocated without repercussions. The absence of evidence regarding the availability and accessibility of alternative fishing grounds raises concerns, as such displacement could lead to overfishing in other areas, adversely affecting the local fishing fleet and its livelihoods.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to create disturbances over extensive distances, which may

negatively impact local wildlife, including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise the significance of these potential effects without adequate supporting evidence.

There is a notable inconsistency within the application that acknowledges the necessity of licences for any harm to European Protected Species while simultaneously claiming such impacts are negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when harm is expected to occur at a level that necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with both National Planning Framework 4 and the National Marine Plan. It does not show that the development can coexist with current marine users or avoid unacceptable effects on marine biodiversity, thereby hindering any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project as a whole is fundamentally flawed, as it fails to provide a complete evaluation of the impacts associated with what constitutes a single integrated endeavour. The distinct treatment of offshore turbines and onshore works results in a fragmented analysis that obscures the true scope of the environmental and socio-economic consequences.

The onshore infrastructure comprises various elements, including cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access routes through delicate landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which is recognised as both an ecologically sensitive habitat and a critical carbon store. The application does not offer a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Furthermore, the separation of assessments for offshore and onshore components leads to a failure to evaluate cumulative effects adequately. The Environmental Impact

Assessment process mandates that all parts of a project be examined collectively. However, the disjointed assessment obscures the combined effects on peatlands, habitats, and local communities, leaving significant risks unaddressed.

There are substantial threats to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application lacks sufficient evidence that impacts on these habitats have been fully evaluated or that effective avoidance measures have been implemented, which raises a clear evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland areas can release stored carbon, leading to a potential carbon debt that contradicts the aims of renewable energy initiatives. The application fails to tackle this issue adequately or to demonstrate that the overall carbon balance remains advantageous.

Moreover, the routing of the infrastructure through active croft land introduces risks of conflict with existing land uses and legal entitlements. There is no evidence provided that the necessary consents or processes have been initiated, which raises concerns about the project's deliverability and lawful execution.

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

In summary, the separation of the project's components, the lack of a comprehensive impact assessment, and insufficient evidence concerning environmental and land use implications collectively render this aspect of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The failure to assess dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will create a pervasive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

Moreover, the application lacks an evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the integral role of dark skies in the area’s identity and in emerging sectors like astro-tourism, this omission is particularly concerning. The absence of such assessments creates a clear gap in the overall landscape and environmental evaluation.

Equally troubling is the lack of analysis regarding impacts on nocturnal wildlife. Species

such as 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 collision risk. The application does not include any assessment of lighting impacts or phototaxis studies, resulting in a failure to understand how aviation lighting may affect these species or contribute to increased mortality.

This issue is exacerbated by the dependence on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical shortfall in understanding the ecological impacts.

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

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

In summary, the absence of any assessment pertaining to dark skies and nocturnal wildlife signifies a considerable 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 is critically inadequate and neglects to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. This area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which is demonstrated by the fact that 86% of visitors are attracted by the scenery. However, the application fails to provide any quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the island has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and contributing up to 16% of the local economy. Despite this progress, the application does not evaluate how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the island. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a sector that is both

established and expanding.

Moreover, the assessment overlooks the crucial role of environmental quality in supporting tourism, including the significance of unspoiled landscapes and dark skies to enhance visitor experience and to tap into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on a recognised and growing segment of the local economy.

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

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

In summary, the collective failure to quantify tourism impacts, analyse the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency leads to a significant evidential gap. This hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the 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.

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: 2EC5F4F4

Member of the public 1772

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and accompanying documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The design, scale, and proximity of the project raise serious concerns about its alignment with statutory requirements, national policies, and the principles of sustainable development.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally lacking and fails to fulfil the statutory obligations of the Environmental Impact Assessment regime. Rather than delivering a structured and reasoned comparison of viable alternatives with

respect to their environmental impacts, the application merely recounts the evolution of the project. This narrative fails to convincingly show that less harmful options have been identified, assessed, and selected over more damaging ones.

There is a notable absence of a transparent and evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not adequately illustrate that the developer has given serious consideration to positioning the turbines further offshore, a move that would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact, the lack of such analysis undermines any assertion that the proposed siting is the least damaging option available.

These deficiencies are also evident in the assessment of cable routing and landfall, where insufficient evidence is provided to indicate that alternative routes have been thoroughly explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been effectively implemented, instead leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful consideration of site selection, layout, and infrastructure routing. This shortcoming reflects a failure to adhere to the established mitigation hierarchy, which hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The absence of a rigorous alternatives assessment raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that leads to the overarching 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 is critically flawed and does not adequately reflect the ecological conditions of the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically diverse marine ecosystem, yet the available baseline data remains incomplete. The methodologies employed in the assessment do not successfully capture vital information regarding the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a reliable evidential foundation for determining potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical inconsistency arises in the application, where the developer asserts there are

no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and suggests that its conclusions lack support from the underlying evidence. The evaluation does not sufficiently demonstrate that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully taken into account, and the reliance on modelling approaches introduces uncertainty, especially concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and an incomplete understanding of behavioural responses.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity demonstrates significant inadequacies, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a simplistic viewpoint that treats heritage as a collection of isolated, static assets.

A notable shortcoming in the application is its handling of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment wrongly categorises them as static features. This oversight neglects their continued use and significance

and disregards how development would affect their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and overlooks their essential role in community life.

Moreover, the application does not address intangible cultural heritage, such as the Gaelic language and traditions, alongside the community's long-standing relationship with the coastal environment. These factors are central to the area's identity and are absent from the assessment, representing a significant gap. Without the inclusion of these elements, the true cultural impact of the proposed development cannot be accurately gauged.

There are additional concerns regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of genuine engagement undermines the credibility of the assessment and neglects established principles of participation in matters that affect cultural and environmental interests.

Furthermore, a critical procedural deficiency exists 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 meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially concerning the preservation of historic assets and sites. The failure to consider both tangible and intangible heritage, alongside an acknowledgment of living cultural practices, indicates a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a firm foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the social impacts, health, and wellbeing associated with the proposed development raises serious concerns regarding the application’s validity. A commissioned Social Impact Assessment involved local residents through focus groups; however, the full report has not been made available. This omission results in a substantial evidential gap, hindering both public understanding and the competent authority’s ability to assess the social risks identified in the developer’s own research.

Available summaries reveal that residents are currently facing tangible stress, anxiety, and concerns due to the scale and proximity of the proposal. These impacts are not

speculative, as they stem from direct engagement with the community. Nevertheless, the failure to disclose the complete assessment restricts meaningful scrutiny of the findings, limiting the capacity to gauge their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, these critical impacts have not been adequately incorporated into the main application, nor have they been given the necessary weight in deliberations. The withholding of the full Social Impact Assessment consequently obscures the true human and social costs that could arise from the development.

This lack of disclosure not only undermines the Environmental Impact Assessment process but also prevents a comprehensive understanding of the social, economic, and health implications of such a large-scale development, particularly regarding its effect on community character and functioning. The absence of the full dataset means the application fails to provide a complete evidential basis for balancing potential benefits against harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avert harm, yet the available evidence points to existing adverse effects that remain inadequately disclosed. Without the complete assessment, compliance with this policy cannot be confirmed.

Procedurally, the implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This inadequacy hinders a lawful determination and underscores the conclusion that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would lead to a continuous and dominant industrial presence, fundamentally transforming this character in a permanent and irreversible manner. The assessment fails to adequately 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, thereby directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The failure to convey the true extent of this impact

within the context of such a sensitive landscape raises significant concerns.

Moreover, methodological issues are evident in the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately represent the most sensitive receptors or worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a risk that the actual magnitude of visual impact has been understated, which undermines the reliability of the assessment process.

Additionally, there is a critical deficiency in the assessment's treatment of the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these assets in isolation, disregarding their interdependence and leading to an incomplete assessment of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is incompatible with the necessity to safeguard 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 requirements.

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 unavoidable. Therefore, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the necessary 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 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 application proposes significant onshore infrastructure related to an integrated project involving offshore turbines and associated works. However, the assessment of the onshore elements is materially incomplete, failing to consider the full extent of impacts. The onshore works encompass cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As a result, the application does not provide a thorough evaluation of the environmental footprint, preventing a complete understanding of the project's impacts.

The separation of the onshore and offshore components leads to a fragmented approach, which obscures the true scale of environmental and socio-economic effects. This lack of a comprehensive assessment also hinders the ability to evaluate cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the current assessment fails to integrate the combined effects on peatlands, habitats, and local communities.

Moreover, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The proposal does not adequately demonstrate that impacts on these habitats have been fully assessed, nor does it show that appropriate avoidance measures are in place. This raises a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the disturbance of peatland, which releases stored carbon and potentially creates a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this issue and fails to demonstrate that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, casting doubt on its deliverability and lawful implementation.

From a policy perspective, the failure to assess the project as a cohesive whole and the inability to demonstrate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. This further undermines the application, as it does not show that impacts can be avoided or mitigated.

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

TOURISM

The application presents a concerning deficiency in assessing tourism impacts, crucial for the economy of the Isle of Lewis. With tourism significantly reliant on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness, the application acknowledges that 86% of visitors are attracted by the scenery. However, it fails to provide any quantified assessment of how large-scale offshore infrastructure could alter visitor numbers, behaviours, or the economic contributions made by this sector.

Tourism has seen substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this, there is no modelling to examine how the potential industrialisation of the seascape and subsequent loss of environmental quality might affect Tourism Gross Value Added or the overall economic resilience of the area. This lack of analysis renders it impossible to ascertain if the proposed development would result in a net economic benefit or detriment to a crucial and expanding sector.

Furthermore, the assessment neglects to address the critical role that environmental quality plays in tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the effects on a recognised and

burgeoning segment of the local economy.

Given the limited economic diversification within the island community, the neglect to assess tourism impacts carries broader ramifications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, the failure to analyse environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies culminate in a significant evidential gap. This inhibits a thorough evaluation of economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

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

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

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

The proposal stands in direct contradiction to National Planning Framework 4. It fails to

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete and internally inconsistent assessments regarding marine ecology, seabirds, protected species, and marine mammals fail to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and precludes a lawful conclusion that the impacts of the proposal are acceptable.

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

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

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: C8F7425B

Member of the public 1773

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 concerns expressed are rooted in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The development site is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The proposal's scale, design, and proximity to the shoreline raise essential questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Crucially, the application lacks a sufficient evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Several key aspects of the proposal are still undefined, and the use of a flexible design framework obscures the likely significant effects. The reliance on unspecified mitigation measures further complicates the assessment, making it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust support.

Furthermore, there are clear and significant policy conflicts within the application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and diminish the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises considerable concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy, it is evident 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 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 lack of a thorough and evidence-based assessment of alternatives severely undermines the application’s compliance with the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic

alternatives based on their environmental effects. Instead, it offers a narrative of project evolution that fails to demonstrate that the developer has identified and considered less harmful options in favour of more damaging solutions.

There is no transparent comparison of offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely contemplated placing turbines further offshore, where the visual, ecological, and coastal impacts might be significantly lessened. The sensitivity of the West Lewis coastline, coupled with the crucial importance of proximity to shore in assessing impact, highlights the significant oversight in not including this analysis, thus making it impossible to conclude that the proposed siting is the least damaging option available.

Moreover, this inadequacy extends to the evaluation of cable routing and landfall. There is little evidence that alternative routes have been adequately explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The failure to provide a clear strategy for avoidance and the absence of comparative analysis suggest a neglect of mitigation by design, with an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This oversight represents a significant failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is not possible to conclude that the proposal is sustainable or in accordance with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region, known for its sensitivity and biological activity, is not well represented in the baseline data gathered. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of key species, which compromises the validity of the impact evaluations.

One glaring oversight is the treatment of otters, a species protected under European law. The application neglects to properly identify and assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and

behavioural habits means that the potential impacts of construction disturbance, noise, and increased activity remain inadequately evaluated. This omission significantly undermines claims regarding the absence of significant effects on otters.

Moreover, the assessment of basking sharks suffers from methodological flaws, particularly due to the reliance on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely results in an underrepresentation of their presence, in stark contrast to established land-based observations which indicate frequent usage of these waters. The disregard for or improper consideration of this crucial data further contributes to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, this introduces uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it fails to accurately identify or assess protected species. The degree of uncertainty that arises prevents the possibility of ruling out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These critical deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking the necessary evidence and containing numerous internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself. The developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious questions about the validity of the

assessment, suggesting that the conclusions drawn are not supported by adequate evidence.

Moreover, the assessment lacks sufficient evidence to ensure that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, especially concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is insufficient and behavioural responses are not well understood.

The placement of turbines within a recognised migratory corridor further exacerbates the risk by effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to sufficiently assess the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also in question, as the application does not meet the evidential standards required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and undermines a lawful conclusion in support of consent.

In summary, the identified deficiencies reflect a lack of adherence to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. Collectively, these issues render the assessment unreliable, due to methodological weaknesses and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning community identity and cultural heritage in relation to the West Lewis coastline is fundamentally flawed. This area is a living cultural landscape where environment, language, tradition, and community are interconnected, yet the application treats heritage as isolated and static, failing to acknowledge its social, cultural, and spiritual significance within the community.

A major shortcoming is evident in how culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These locations serve as active burial sites and places of spiritual practice, but the assessment categorises them merely as static features, neglecting their ongoing use and the development's potential impact on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

Additionally, the assessment omits intangible cultural heritage elements, including the Gaelic language and local traditions, as well as the community's long-standing relationship with the coastal environment. These aspects are crucial to the area's identity and their absence represents a significant oversight. The lack of consideration for these factors means that the cultural implications of the development are inadequately understood.

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

Moreover, there is a critical procedural gap due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement established by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

These deficiencies also have policy implications, as they put the proposal in direct conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with living cultural practices, deviates significantly from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development remain unassessed, and the application lacks a solid foundation for determining the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, rendering it materially incomplete. There is an absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans, which is particularly troubling given the high-energy Atlantic environment where substantial seabed preparation and installation works are planned. Instead, the application opts to rely on vague mitigation and contingency measures that are set to be determined after consent is granted, making it impossible to evaluate their sufficiency or effectiveness prior to that point.

The implications of this approach raise serious concerns due to the sensitivity of the

West Lewis coastline, which is known for its clean coastal waters and vital habitats. These habitats are susceptible to disturbance from sediment and contamination, yet the application fails to provide adequate detail on preventing, controlling, or monitoring risks such as sediment mobilisation and potential chemical or oil spills.

Moreover, there is considerable uncertainty about the behaviour and scale of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and well-defined management strategies means it is impossible to ascertain the ecological effects or duration of these impacts. This uncertainty extends to identified marine species and habitats that are already deemed sensitive within the wider assessment framework.

The deficiencies are further exacerbated by the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the proposal undermines the ability to evaluate whether sufficient safeguards are established to address potential pollution events. This procedural risk complicates the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards goes against the principles of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be thoroughly assessed before consent, and the absence of this information renders a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the overall inadequacy of defined mitigation measures, coupled with the lack of detailed management plans and the uncertainty surrounding potential impacts, leads to the conclusion that the assessment is fundamentally flawed. These issues hinder a rigorous evaluation of the construction and pollution risks associated with the proposal.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The local waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry; however, the application does not convincingly demonstrate how these habitats and activities can be protected or preserved without causing significant disruption.

One major concern is the assumption that fishing activities can be relocated without negative effects. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the added pressure. This gap in the assessment is crucial, as displacing fishing efforts could lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fishing fleet. The lack of a clear, evidence-based assessment hampers the understanding of impacts on fisheries and local livelihoods.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over extended periods is likely to disturb marine life over large areas, particularly species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises pressing concerns, yet the application minimizes these effects without providing adequate supporting evidence.

The application also presents a contradiction regarding the need for licences to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive review 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 comply with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development includes significant onshore infrastructure elements such as the construction of a substation near Stornoway, cabling across protected moorland, and access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. However, the application fails to provide a comprehensive assessment of these impacts, leaving a critical gap in understanding the overall environmental footprint of the project.

A significant concern arises from the fragmented assessment approach, which treats offshore turbines and onshore works separately despite their intrinsic link. This separation obscures the cumulative effects on peatlands, habitats, and local communities, which must be evaluated collectively as stipulated by the Environmental Impact Assessment process. The exclusion of onshore impacts undermines the ability to fully comprehend the project's overall implications.

Furthermore, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate a thorough assessment of potential impacts on these habitats or indicate that adequate avoidance measures have been considered, creating a notable evidential gap concerning biodiversity protection.

The proposal also raises critical questions about carbon balance, as the disturbance of peatland releases stored carbon, potentially creating a carbon debt contrary to renewable energy objectives. The application inadequately addresses this issue, failing to prove that the overall carbon balance remains advantageous.

Additionally, routing the infrastructure through active croft land poses conflicts with existing land uses and legal rights. There is no evidence that necessary consents or processes have been initiated, raising significant concerns about the feasibility and legality of the project.

Overall, the failure to assess the project comprehensively, combined with the lack of evidence concerning environmental impacts and land use considerations, directly conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further casts doubt on the application, rendering it incomplete and unreliable, and preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment neglects to assess the impacts of this proposal on dark skies and nocturnal wildlife, representing a significant oversight. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to evaluate how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and the growing tourism sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these impacts demonstrates a clear gap in the overall landscape and environmental assessment.

In addition, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can disorient them and increase the risk of collisions. The absence of a lighting impact assessment or phototaxis study means that the application does not evaluate how aviation lighting might impact these species or contribute to their mortality.

This issue is exacerbated by the dependence on daytime survey data in the

ornithological assessment, which fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has gone unassessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and hinders a lawful determination.

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

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

TOURISM

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

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

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

In a community like this island, which suffers from limited economic diversification, the

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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]

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: 1E90CA1C

Member of the public 1774

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. A thorough review of the Environmental Impact Assessment Report and its accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. The site is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The concerns surrounding the scale, proximity, and design of this proposal fundamentally challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application is critically lacking in an evidential basis necessary for lawful determination. There is a troubling absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Several key elements of the proposal remain undefined, hindering any clear understanding of the likely significant effects. Furthermore, the use of a flexible design framework complicates the assessment, and the unspecified mitigation measures mean their potential effectiveness remains unknown. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantial policy conflicts are also evident. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, jeopardising the ability of the competent authority to determine the acceptability of the development from a policy perspective.

The unprecedented scale of this proposal introduces additional concerns, with large turbines situated in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. Given these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental repercussions of the proposal. The implementation of a flexible Project Design Envelope, which lacks firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. Such a situation undermines the assessment's integrity and results in impacts that may not accurately represent the development that will ultimately be constructed. This deficiency precludes both the public and the competent authority from grasping the true extent of the environmental effects involved.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is sought on the premise that any environmental harm will be addressed subsequently, hindering any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly articulated before determination.

Additionally, there are significant evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These issues yield uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate conformity with National Planning Framework 4, especially with respect to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly evaluated or that suitable safeguards are in place.

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 impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information currently available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to provide a complete or dependable understanding of the ecological receptors in the West Lewis coastal area. This region is a sensitive and biologically rich marine environment, yet the baseline data available is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant shortcoming lies in the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active usage of coastal regions for foraging and movement. This oversight, particularly concerning their core foraging ranges and behavioural tendencies, leaves the potential effects of construction disturbances, noise, and increased human activity unassessed. As a result, any conclusions drawn regarding the absence of significant effects on otters are undermined.

Moreover, the assessment of basking sharks also reveals considerable deficiencies. The reliance on aerial surveys introduces a substantial detection bias, especially under Atlantic conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations that indicate frequent use of the waters in question. The failure to incorporate or adequately consider such relevant data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of adequate baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises significant concerns regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements established under the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced necessitates the application of the precautionary principle, preventing the exclusion of adverse effects beyond reasonable scientific doubt. In light of these issues, granting consent would not be lawful.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

turbines in close proximity to the shoreline poses a risk of creating a continuous and dominant industrial presence, which would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately represent the extent of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and erode the essential qualities of naturalness and remoteness, yet the assessment does not convey the significance of this level of impact in relation to such a sensitive landscape.

There are significant methodological issues regarding how visual viewpoints have been selected and presented. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation risks underestimating the magnitude of the visual impact, which undermines the overall reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change proposed is inconsistent with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the absence of a robust worst-case assessment further undermines any assertion of compliance with relevant policies.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding dark skies and nocturnal wildlife is a serious deficiency in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed development includes the installation of permanent red aviation lighting that would be visible over vast distances. This would create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time landscape.

The proposal fails to address how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to local identity and the emerging sector of astro-tourism. The absence of this analysis creates a notable gap in the overall assessment of both landscape and environmental effects.

Moreover, there is a complete lack of evaluation regarding the implications for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and a heightened risk of collision. The application neglects to include any assessment of lighting impacts or a phototaxis study, failing to examine how aviation lighting might impact these species or exacerbate mortality rates.

This oversight is intensified by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. For instance, 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 represents a crucial gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether the proposal could negatively impact protected species or designated sites. The necessary evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, particularly regarding the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night environment is a crucial aspect of the ecosystem.

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

TOURISM

The assessment regarding the impacts on tourism is significantly lacking, failing to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. With tourism relying heavily on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness, it is concerning that the application acknowledges that 86% of visitors are attracted by the scenery yet does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or their overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and contributing up to 16% to the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains unclear whether the development would result in a net economic benefit or adversely affect an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, including emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leading to a considerable gap in understanding the impacts on this recognised and growing aspect of the local economy.

In an island community with limited economic diversification, the oversight in assessing tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

When taken together, the deficiencies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency create a substantial evidential gap. This hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The 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

I have holidayed many times in Lewis and its natural beauty is so important for residents and tourists alike.

Once changed, it can never be returned to how it was

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: 08C410A5

Member of the public 1775

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 relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the development raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantial policy conflicts are evident. The proposal appears to conflict 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 satisfactorily 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 weaken the competent authority's ability to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant issues 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 must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a thorough comparison of realistic alternatives based on their

environmental effects, it presents a narrative describing the evolution of the project. This method does not adequately demonstrate that less harmful options have been properly identified, evaluated, and chosen over more damaging ones.

There is a notable lack of a transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously contemplated placing the turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in assessing impacts, the absence of such an analysis hinders any conclusion that the proposed siting is the least harmful option available.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors. Such receptors include culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that there has been no application of mitigation by design, with a reliance instead on measures to be taken post-design.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This is indicative of a failure to adhere to the established mitigation hierarchy, which in turn prevents the competent authority from understanding whether less harmful and more suitable alternatives exist. In the absence of a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment represents a material omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the proposal is significantly lacking, failing to offer a thorough and dependable understanding of ecological receptors in the West Lewis coastal area. This marine system is both highly sensitive and biologically active, yet the existing baseline data remains incomplete, while the methodologies employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, the assessment does not furnish a sound evidential framework for assessing potential impacts.

One notable gap concerns otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active

utilisation of coastal regions for foraging and movement. The oversight of their core foraging areas and behavioural patterns leads to an inadequate evaluation of the possible impacts stemming from construction activities, noise, and increased human activity. This deficiency undermines any assertions about the lack of significant effects on the otter population.

Moreover, the assessment of basking sharks exhibits further shortcomings, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent usage of these waters. The exclusion or insufficient consideration of such data results in an incomplete baseline and diminishes the trustworthiness of the conclusions drawn.

These methodological flaws indicate that the assertions of negligible or non-significant effects rest more on presumptions than on solid evidence. The lack of comprehensive baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment framework and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty introduced by these shortcomings means that it is impossible to rule out adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

There is a troubling contradiction in the application: the developer asserts that there will be no significant adverse effects while simultaneously advancing a case for

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The application adopts a reductive perspective, treating heritage merely as isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Notably, the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a key deficiency. These sites serve as active places of burial and spiritual practice; however, they are classified as static features in the assessment. This oversight neglects their continued use and the implications of development on their surroundings. As a result, the evaluation of cultural effects is incomplete, dismissing their vital role in community life.

Additionally, the assessment disregards intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are fundamental to the area's identity, yet they are entirely overlooked, creating a significant gap in understanding the true cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics recognized for Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to honour established principles of participation in matters affecting cultural and environmental interests.

A further critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission is enough to render the determination unlawful.

From a policy standpoint, the inadequacies in the application place it in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, and the neglect of living cultural practices, signifies a clear violation of policy requirements.

Ultimately, the collective 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 improperly assessed, and the application lacks a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal's social impacts on the community have not been adequately assessed. The developer produced a Social Impact Assessment, which included discussions with local residents, but the complete report has not been shared. This lack of transparency creates a significant gap in the evidence, preventing both the public and the responsible authorities from understanding the social risks revealed by the developer's research.

Residents are currently facing measurable stress, anxiety, and concern due to the project's size and its proximity to their homes. These effects stem from direct feedback and are not mere speculation. However, the withholding of the full assessment limits the opportunity for thorough examination of the results and restricts the capacity to assess their relevance in the decision-making process.

Furthermore, there is a perception that the proposal threatens community identity and cohesion, with the developer identifying "cultural loss" in their findings. Despite this recognition, these social impacts have not been properly included in the application

nor have they been given adequate consideration. The failure to disclose the complete Social Impact Assessment conceals the true human and social consequences of the development.

This lack of transparency also weakens the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health ramifications is crucial for large developments, especially when they may affect the character and operation of the community. By not providing the complete set of data, the application does not offer a comprehensive evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not align with the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and avoid negative impacts, yet the existing evidence suggests adverse effects that remain undisclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to perform a thorough evaluation of socio-economic and health impacts without the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy the evidential requirements necessary under the Environmental Impact Assessment guidelines.

Overall, the decision not to disclose the full Social Impact Assessment, combined with clear evidence of negative impacts already felt by the community, leads to an incomplete and unreliable evaluation. This situation hinders a lawful determination and reinforces the view 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 application does not provide sufficient detail to assess construction and pollution risks, which raises serious concerns. It involves significant seabed preparation and installation in a challenging Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures to be created after consent is granted. This approach limits the ability to evaluate their effectiveness or adequacy.

The West Lewis coastline is particularly sensitive, supporting clean coastal waters and vital habitats that may be harmed by sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on prevention, control, or

monitoring strategies.

There is also uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installation. Robust modelling and clearly defined management strategies are necessary to understand the potential extent, duration, and ecological effects of these impacts. This uncertainty encompasses potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures further heightens these issues. By postponing contingency planning until after consent, the application obstructs a proper evaluation of whether appropriate safeguards exist to deal with pollution incidents. This not only introduces procedural risk but also hinders the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the Environmental Impact Assessment requirements. Significant effects and necessary mitigation must be evaluated before granting consent, and without this information, a lawful determination cannot occur. The application does not demonstrate compliance with policies 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 create a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to cause disturbances over large distances, impacting species such as dolphins. Concerns arise from the predicted disruption to a significant portion of the local bottlenose dolphin population; however, the application tends to downplay these effects without adequate supporting evidence.

An assessment of fisheries and marine life is critically lacking, as it does not provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast sustain both a diverse marine ecosystem and an active fishing industry. Yet, the application fails to illustrate how these vital uses and habitats can be safeguarded or sustained without substantial disruption. There is a fundamental issue with the assumption that fishing activity can be displaced without consequences. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This omission is crucial, as displacing fishing could lead to overfishing in other areas and might result in broader economic repercussions for the local fleet. A clear and evidence-based assessment is necessary to comprehend the impacts on fisheries and livelihoods properly.

Moreover, the application shows an inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, particularly when harm is anticipated to such a degree that it requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project fails to adequately address the interconnected nature of its components, specifically the offshore turbines and the associated onshore infrastructure. This fragmented approach obscures the full extent of environmental and socio-economic impacts, as the various elements of the project are not evaluated collectively. The implications of this incomplete assessment extend to significant onshore works, which involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through ecologically sensitive areas. These activities require excavation in regions of deep peat, notably within Barvas Moor, which is a crucial carbon store and habitat of considerable ecological significance.

Furthermore, by omitting or postponing the evaluation of these onshore impacts, the application undermines the assessment of cumulative effects. The Environmental Impact Assessment mandates a holistic consideration of all project components; however, the current division between offshore and onshore assessments fails to reveal the combined repercussions on peatlands, ecosystems, and local communities.

There are pressing concerns regarding sensitive habitats, including machair systems and peatland environments, that are recognised in policy protections. The application does not sufficiently demonstrate that these habitats have been thoroughly assessed or that adequate avoidance measures have been implemented, highlighting a

significant gap in evidence related to biodiversity protection.

In addition, the routing of infrastructure through active croft land raises potential conflicts with established land uses and legal rights. The application lacks substantiating evidence that the necessary consents or protocols have been pursued, which raises serious doubts about the project's deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project comprehensively, along with the inability to ensure the protection of peatlands and habitats, is in direct conflict with the National Marine Plan and National Planning Framework 4. The lack of demonstrable measures for avoiding or mitigating impacts further weakens the application.

Overall, the separation of project elements, the absence of thorough assessments, and the insufficient evidence regarding environmental and land use impacts render this section of the application fundamentally incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider dark skies and nocturnal wildlife, representing a serious oversight. The proposed development would introduce permanent red aviation lighting that would be visible over long distances. This would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to emerging tourism sectors like astro-tourism, this omission is particularly concerning. The application also neglects to evaluate the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are at risk of disorientation and increased collision due to artificial lighting. The lack of any lighting impact assessment or phototaxis study means the potential effects on these species and their mortality risk remain unexamined.

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

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

precautionary principle and obstructing a lawful determination.

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

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

TOURISM

The evaluation of tourism impacts is severely lacking and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The viability of tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions from tourism.

Significantly, tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not simulate how the potential industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a flourishing sector.

Additionally, the assessment neglects the critical role environmental quality plays in enhancing tourism, including the significance of unspoilt landscapes and dark skies for visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts presents broader risks for employment, local enterprises, and the sustainability of the community. The absence of a thorough Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to prove its compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish sufficient evidence for the competent authority

to evaluate the economic implications of the proposal.

In summary, the collective failure to quantify tourism impacts, analyse environmental influences on visitor behaviour, and account for the island's economic dependencies leads to a significant evidential void. This gap hinders a thorough assessment of the economic effects and underscores the conclusion that the application is inadequate.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the fundamental concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current application, while submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still does not adequately address these issues.

There are significant shortcomings in the evidential basis for the application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope and reliance on unspecified mitigation measures. Additionally, there are omissions concerning key impact pathways, including effects on nocturnal wildlife, the complete onshore infrastructure, and potential tourism implications. As a result, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of likely significant effects or any residual impacts.

The application also presents clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a material omission. These deficiencies obstruct the competent authority’s ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts the directives of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The required evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption to cultural and visual relationships, and adverse impacts on tourism represent permanent alterations that cannot be mitigated to a level deemed acceptable.

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

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

Additional Comments

I utterly devestated that this industrislal complex would even be considered in this part of Scotland

The destruction is beyond devestating
To indigenous way of life
To bio diverse marine life
To dark skies
To our precious precious lands being destroyed for ever

My heart is broken

Stop the ecoside of Scotland
Save Lewis for our Children
Save our environment

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 645D6C76

Member of the public 1776

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and accompanying materials, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with statutory obligations, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful assessment. There are critical gaps in environmental data, with baseline information that is both limited and inconsistent, while several key components of the proposal remain undefined. The application employs a flexible design framework, which complicates the understanding of potential significant effects, and the unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident, with the proposal appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4. This inconsistency is particularly relevant concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the ability of the competent authority to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal raises serious concerns, particularly regarding the placement of large turbines in close proximity to the shoreline, which could significantly impact landscape capacity and create visual dominance. The combined effect of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and notable policy non-compliance underscores that the application is incomplete and unfit to support a lawful determination. In this context, the application of the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, clear, or dependable evaluation of the anticipated environmental impacts stemming from the proposal. The reliance on a flexible Project Design Envelope, which lacks definitive specifications for turbine dimensions, layouts, or configurations, creates significant uncertainty and hinders a consistent application of a worst-case scenario. This compromise undermines the integrity of the assessment, leading to a situation where the impacts detailed may not correspond to the actual development, thus obstructing both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

The application also places considerable emphasis on unrefined mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought under the assumption that environmental harm will be rectified at a later stage, rendering any meaningful evaluation of effectiveness or assessment of residual impacts impossible. This postponement of essential information to post-consent phases is procedurally inappropriate and contradicts the fundamental aim of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigations must be clearly delineated prior to determination.

Moreover, there are notable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly in cases where negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential standards mandated under the Habitats Regulations, failing to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. The proposal also does not show compliance with National Planning Framework 4, which includes provisions for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These inadequacies prevent a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a decision based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is severely lacking and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. The application presents a narrative account of project evolution instead of a structured, reasoned comparison of realistic alternatives based on environmental effects. This failure to

properly identify, assess, and select less harmful options in favour of more damaging solutions is concerning.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and dependable understanding of the ecological receptors present in this sensitive marine area. The baseline data is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment fails to establish a credible evidential basis for understanding potential impacts.

Particularly concerning is the oversight regarding otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active usage of coastal regions for foraging and movement. This oversight neglects critical factors such as their core foraging range and behavioural patterns, leading to an

inadequate assessment of the potential impacts stemming from construction activities, noise, and increased human activity. Such gaps significantly undermine any assertions regarding the lack of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction exists within the application, as the developer concludes that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is expected, which raises doubts about the reliability of the assessment and indicates that the conclusions

reached are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient evidence to assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly considered, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and the behavioural responses of the birds are not fully understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts an overly simplistic viewpoint, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spiritual sites, yet they are mischaracterised in the assessment as static features, disregarding their continued use, significance, and the implications of development on their surroundings. This inadequate portrayal leads to an incomplete understanding of cultural effects and overlooks the vital role these sites play in

community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are essential to the area's identity but are entirely omitted from the evaluation, creating a critical gap in understanding the cultural impact of the proposed development.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement calls into question the legitimacy of the assessment and contravenes established principles for participation in matters affecting cultural and environmental interests.

A major procedural failure is the absence of a compliant Island Communities Impact Assessment, which is legally mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these significant deficiencies position the proposal in direct conflict with the National Planning Framework 4, especially concerning the protection of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, clearly diverges from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not offer a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that includes focus groups with local residents; however, the full report has not been published. This lack of transparency creates a significant evidential gap and prevents both the public and the competent authority from fully understanding the social risks highlighted in the developer’s own research. Available summaries suggest that residents are already experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement and not on speculation. Nevertheless, the failure to disclose the complete assessment limits the ability to scrutinise the findings and hinders the determination of their significance in the decision-making process.

There is evidence indicating that the proposal poses a direct threat to community

identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this, these impacts have not been adequately integrated into the main application or given the necessary weight. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured. This lack of transparency also undermines the Environmental Impact Assessment process. For developments of this scale, a comprehensive understanding of social, economic, and health impacts is crucial, especially when community character and functioning may be affected. The application fails to provide a complete evidential basis for assessing the balance between benefits and harm due to the absence of the full dataset.

From a policy standpoint, the application does not comply with National Planning Framework 4 concerning health and wellbeing. Developments should support 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, compliance with this policy cannot be shown. The procedural implications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application, failing to meet the evidential requirements of the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, makes the assessment incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application does not possess sufficient information to move forward.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of seascape, landscape, and visual impacts is significantly lacking and fails to adequately capture the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The placement of large-scale turbines in close proximity to the coast would create an uninterrupted industrial presence, fundamentally transforming this character and leading to an irreversible alteration of the landscape.

The application also does not sufficiently represent the scale of visual change. Given their size and location, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct negative effect on visual amenity and undermine the inherent qualities of naturalness and remoteness. The assessment fails to accurately communicate the level of this impact and its significance, especially in the context of such a sensitive landscape.

There are methodological issues 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, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, diminishing the

overall reliability of the findings.

Moreover, there is a crucial shortcoming in addressing the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected through visual and spatial relationships with the Atlantic horizon. The assessment treats these important assets as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal stands in direct opposition to National Planning Framework 4 concerning the preservation of natural locations and historic assets. The extent of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case assessment further weakens any assertion of compliance with policy requirements.

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

Collectively, these shortcomings mean that the assessment does not accurately represent the impact's scale, the environmental sensitivity, or the interconnected nature of landscape and heritage. These deficiencies hinder a dependable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is insufficient and lacks the necessary detail to assess potential environmental impacts adequately. The proposal entails considerable seabed preparation and installation activities in a high-energy Atlantic environment, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be established after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness.

This dependence on unspecified future measures is particularly alarming considering the sensitivity of the affected environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disruption and pollution. Although the application recognises hazards such as sediment mobilisation

and accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, managed, or monitored.

Furthermore, there remains uncertainty regarding the extent 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 scope, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application hampers the evaluation of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of vital environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. The application also fails to demonstrate adherence to policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposed development poses serious risks to marine life and the fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector. However, the application does not adequately demonstrate how these habitats and uses will be protected from significant disruption.

A major concern is the assumption that fishing activities can be shifted without negative consequences. The application lacks evidence to show that alternative fishing grounds exist, are accessible, or can handle the additional pressures of displaced fishing. This gap in information is critical, as forcing displacement could lead to overfishing in other areas and have detrimental economic impacts on the local fishing fleet. Without a solid, evidence-based evaluation, the repercussions for fisheries and livelihoods remain unclear.

Moreover, the project poses considerable threats to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer

piling over prolonged periods is anticipated to disturb marine life across extensive areas, particularly affecting dolphins. The expected disruption to a significant portion of the local bottlenose dolphin population raises substantial worries, yet the application minimises these effects without adequate evidence.

There is also a notable inconsistency within the application that acknowledges the necessity for licences to allow harm to European Protected Species while concurrently claiming that the impacts are negligible. This contradiction calls into question the credibility of the assessment and brings up concerns about adherence to the Habitats Regulations, especially where anticipated harm may require legal authorisation.

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

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

Overall, the absence of evidence regarding fishing displacement, underestimation of noise impacts, and internal contradictions make the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The failure to assess the project as a whole raises significant concerns regarding the impacts on land use and legal rights. The routing of infrastructure through active croft land introduces potential conflicts, and the application lacks evidence that necessary consents or processes have been initiated. This absence of documentation leads to questions about the deliverability and lawful implementation of the project.

Furthermore, the assessment of onshore infrastructure is materially incomplete, which obscures the true scale of environmental and socio-economic effects. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately, resulting in a fragmented approach that fails to consider the cumulative effects of the project. By excluding or deferring the assessment of onshore impacts, a proper evaluation of cumulative effects on peatlands, habitats, and communities cannot be achieved.

The onshore elements involve construction activities such as cabling across protected moorland and the establishment of a substation near Stornoway. These works require excavation across deep peat areas, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The application does not

provide a comprehensive assessment of these impacts, preventing a full understanding of the project's overall environmental footprint.

There are also considerable risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, creating a clear evidential gap regarding biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The application does not adequately address this issue or demonstrate that the overall carbon balance remains beneficial.

From a policy perspective, the separation of project components and the inability to demonstrate protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated undermines the application and highlights its incompleteness and unreliability, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the crucial aspects of dark skies and nocturnal wildlife, marking a significant omission. The West Lewis coastline boasts exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly for developing sectors like astro-tourism. However, the proposal includes permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

Furthermore, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This oversight is especially troubling given the importance of dark skies to the area's identity. The lack of consideration for these impacts results in a clear deficiency in the overall environmental and landscape assessment.

Equally concerning is the complete absence of an evaluation of the effects on nocturnal wildlife. Sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk from artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting might affect these species or contribute to mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or its associated risks. Kittiwakes, for instance, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of

site-specific night-time data results in a critical gap in understanding the ecological impacts.

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

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

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. Without baseline data, impact modelling, and species-specific analysis, the application remains incomplete and fails to support a lawful determination.

TOURISM

The evaluation of tourism impacts is fundamentally inadequate and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. This sector relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide any quantitative assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced considerable growth, escalating from £65 million in 2017 to over £81.5 million, and it now supports more than 1,000 jobs, accounting for up to 16% of the island's economy. However, the application fails to model the potential effects of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it remains uncertain whether the development would yield a net economic advantage or detract from a well-established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly regarding the vital role of unspoiled landscapes and dark skies in enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a considerable gap in understanding the impacts on an acknowledged and burgeoning segment of the local economy.

In an island community with limited economic diversification, the oversight in evaluating tourism impacts has broader consequences for employment, local

businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately examined as mandated by the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and consider the economic dependence of the island leads to a significant evidential gap. This gap hinders a thorough assessment of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

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

The evidential basis for determining the application is neither complete nor reliable. Significant gaps exist in baseline data, there is an undefined design envelope, mitigation measures remain unspecified, and crucial impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, precluding a comprehensive understanding of likely significant effects or residual impacts.

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

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

and crofting land.

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

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

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

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

Additional Comments

I live in this beautiful landscape and feel we need to protect it from the harms that will affect it if this monstrous development goes ahead. We live in a fragile ecosystem and this level of industrialisation on a small community, its wildlife and habitat is appalling. The benefits, if any, will not outweigh the negative impact - and once damaged, at this scale, the ecosystem may not recover. There has not been proper consultation and objections are being overridden by big business.

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: 2B15A945

Member of the public 1777

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 marine licensing and Environmental Impact Assessment regimes. The objection is rooted in an examination of the Environmental Impact Assessment Report and the associated documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich 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.

The application lacks a sufficient evidential foundation for a lawful decision. Essential environmental data is absent, baseline information is not only limited but also inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework employed fails to allow for a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unverified. Consequently, the available documentation does not afford a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust substantiation.

There are evident and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate concerns, and environmental integrity. These conflicts directly impact the statutory requirements for consent and compromise the ability of the competent authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the project, with large turbines positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposed development is accompanied by an Environmental Impact Assessment Report that is fundamentally lacking, failing to deliver a comprehensive, transparent, or dependable evaluation of the expected environmental impacts. The flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the ability to apply a worst-case scenario consistently. This diminishes the integrity of the assessment, leaving both the public and the competent authority without a clear understanding of the actual environmental effects of the development that may ultimately be constructed.

The application leans heavily on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these conditions implies that any environmental damage will be addressed only after approval, inhibiting a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of essential information to stages following consent is not procedurally acceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that likely significant effects and mitigation strategies must be clearly defined before any determination.

Additionally, the application is marred by substantial evidential deficiencies, including missing baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings result in uncertainty concerning the scale and significance of impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to rendering the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies obstruct a lawful and thorough assessment of environmental impacts and leave the competent authority ill-equipped to make a determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives and fails to meet the statutory requirements of the Environmental Impact Assessment. Instead of providing a structured comparison of realistic alternatives based on environmental effects, it offers a narrative about the project's evolution. This method does not prove that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is a lack of transparent and evidence-based comparisons of various offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline and the importance of proximity to shore in assessing impact highlight the need for this analysis, which is currently absent.

The deficiencies also affect cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been considered, relying instead on post-design measures.

Due to these shortcomings, the application does not demonstrate that environmental harm has been minimised through the selection of site, layout, and infrastructure routing. This indicates a failure to follow the established mitigation hierarchy, which prevents the competent authority from determining if less harmful and more suitable alternatives are available. Without a robust alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally flawed, lacking a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the methodologies used do not adequately capture critical aspects such as species presence, behaviour, and habitat use. Consequently, the conclusions drawn fail to provide a robust evidential basis for evaluating potential impacts.

Significant omissions are evident in the treatment of otters, which are a European Protected Species. The application does not adequately assess their foraging and movement in coastal areas, neglecting to consider their core foraging range and behavioural patterns. This oversight means that the potential impacts of construction-

related disturbance, noise, and increased activity remain inadequately evaluated, undermining any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals substantial deficiencies, as it relies on aerial surveys that introduce considerable detection bias, particularly in Atlantic conditions. This reliance likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate relevant data further contributes to an incomplete baseline, ultimately diminishing the reliability of the presented conclusions.

These methodological shortcomings result in claims of negligible or non-significant effects that are based on mere assumptions rather than sound evidence. The lack of sufficient baseline data also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thereby generating uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally justifiable.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant methodological weaknesses and internal inconsistencies. It fails to provide adequate evidence that the internationally important seabird populations, which inhabit the west coast of the Isle of Lewis and are already in decline, will not be adversely affected. The turbines are situated within key foraging areas and migratory pathways, yet the application does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these species.

Moreover, there exists a fundamental contradiction in the application; the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious questions regarding the validity of the assessment's conclusions, which are not substantiated by the supporting evidence.

The assessment does not convincingly demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents additional risks, as it effectively forms a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term impacts of sustained mortality within this corridor or the potential consequences for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which obstructs a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies demonstrate non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to prove that internationally important seabird populations will remain unharmed places the proposal in direct conflict with national policy.

In conclusion, the assessment's internal inconsistencies, methodological flaws, and lack of supporting evidence culminate in an unreliable evaluation of impacts, reinforcing that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A critical issue arises from the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are categorised in the assessment as static features. This mischaracterisation neglects their continued use and significance, as well as the impact that development would have on their surroundings. Consequently, the evaluation of cultural effects remains incomplete and ignores their integral role in community life.

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

Further issues pertain to community rights and engagement. The Gaelic-speaking community possesses a distinct cultural identity that aligns with the characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment has not been fully published, resulting in a significant evidential gap. This lack of transparency limits both public understanding and the competent authority's ability to evaluate social risks identified in the developer's own research. While available summaries indicate that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, the absence of the complete assessment hinders proper scrutiny of these findings and restricts the decision-making process regarding their significance.

Moreover, the perception of the proposal as a threat to community identity and cohesion has been noted, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately incorporated into the main

application or assigned the necessary weight. The non-disclosure of the full Social Impact Assessment therefore obscures the actual human and social costs of the development.

This opacity also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning are at stake. Without the complete dataset, the application lacks a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the evidence available points to adverse effects that remain undisclosed. Consequently, the absence of the full assessment precludes any demonstration of compliance with this policy.

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

In summary, the failure to disclose the full Social Impact Assessment, coupled with the documented existing adverse impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and substantiates the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed development is significantly flawed and fails to capture the true scale of change and the sensitivity of the surrounding environment. The West Lewis coastline, characterised by its expansive Atlantic horizon, unspoiled nature, and profound sense of isolation, would be profoundly affected by the presence of large-scale turbines situated near the shore. Such an industrial presence would fundamentally transform this unique character, leading to an irreversible alteration of the landscape.

Moreover, the application inadequately reflects the extent of visual change that would ensue. The size and closeness of the turbines would dominate views from local residential areas, historically significant sites, and popular coastal spots. This intrusion would detract from visual amenity and compromise the cherished qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts, particularly given the sensitivity of the landscape in question.

Concerns regarding the methodology employed in selecting and presenting visual

viewpoints are also evident. There is compelling evidence to suggest that the chosen viewpoints do not adequately capture the experience of the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impacts have been underestimated, thereby compromising the credibility of the assessment.

Additionally, the assessment fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a larger landscape that is visually and spatially connected to the Atlantic horizon. By treating these heritage assets as isolated features, the assessment overlooks their interdependencies, resulting in an incomplete understanding of the impacts on their settings and cultural significance.

The anticipated industrialisation of the seascape would disrupt these vital relationships, affecting how heritage assets are perceived and severing their ties to the natural horizon. This constitutes not just a visual disturbance but also a more extensive cultural and spatial detriment that has not been thoroughly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of proposed change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines guarantee a dominant and unavoidable presence. Thus, the anticipated changes are fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately convey the extent of impact, the sensitivity of the environment, and the intertwined relationship of landscape and heritage. These shortcomings inhibit a credible evaluation and reaffirm the position that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, leaving critical details lacking for evaluating the likely environmental effects. Substantial seabed preparation and installation works will take place within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future 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 is especially alarming, given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and potential accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application restricts the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation need to be assessed prior to consent, and when such information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application related to this development lacks a thorough assessment of its ecological and socio-economic impacts. A critical flaw is the presumption that fishing activities can be relocated without repercussions. There is no evidence presented that alternative fishing grounds are available, easily accessible, or capable of withstanding additional fishing pressure. This significant gap raises concerns over potential overfishing in other areas, which could adversely affect the local fishing fleet's economic stability. The absence of a clear, evidence-based evaluation makes it impossible to fully understand the implications for fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy

hammer piling for prolonged periods is expected to disturb marine life across extensive areas, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Additionally, there is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged while simultaneously stating that the impacts are negligible. This contradiction undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, particularly when anticipating harm that necessitates legal authorisation. The assessment further fails to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these compounded effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not align with the requirements of the National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development. Collectively, the inadequacies surrounding evidence on fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the assessment highlight its incompleteness and unreliability, obstructing a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure lacks completeness and fails to address the full range of impacts associated with this single integrated project. There is an intrinsic link between the offshore turbines and the onshore works, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects.

Onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application falls short in providing a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application inhibits a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project are considered collectively. However, the distinct treatment of offshore and onshore elements leads to an incomplete understanding of their combined impacts on peatlands, habitats, and communities.

Moreover, there are notable risks to sensitive habitats, such as machair systems and

peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This leaves a significant evidential gap regarding biodiversity protection.

The proposal also raises serious concerns about carbon balance. Disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy initiatives. The application inadequately addresses this aspect or proves that the overall carbon balance remains advantageous.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. The proposed development includes permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the area’s identity and the emerging tourism sector focused on astro-tourism. The failure to consider these potential impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, the assessment neglects to consider the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The application lacks any lighting impact assessment or phototaxis study, thus failing to evaluate how aviation lighting may affect these

species or increase their mortality rates.

The reliance on daytime survey data within the ornithological assessment further compounds this oversight, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting; however, this potential risk has not been assessed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, these omissions are inconsistent with National Planning Framework 4 concerning the protection of natural places and the maintenance of environmental quality. Additionally, the lack of assessment undermines the broader evaluation of landscape and seascape impacts, as the night-time character is integral to the environment.

In conclusion, the lack of evaluation regarding dark skies and nocturnal wildlife constitutes a serious evidential shortcoming. The deficiency in baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

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

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

In addition to the economic factors, the failure to conduct a compliant Island Communities Impact Assessment means that the vulnerabilities of the local economy have not been evaluated as mandated by the Islands (Scotland) Act 2018. This oversight

has broader implications for community sustainability, local businesses, and employment opportunities within an island community that has limited economic diversification.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is deeply concerning and should be refused in its entirety. It demonstrates significant deficiencies that make it unfit for determination. There are critical gaps in baseline data, which undermine the reliability of the evidence presented. The proposal relies on an undefined design envelope and mitigation measures that are unspecified, while also omitting key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment lacks completeness and fails to provide a comprehensive understanding of the likely significant effects and residual impacts.

Additionally, procedural failures are evident throughout the application. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a full Social Impact Assessment is a material omission that prevents a thorough evaluation of the impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application insufficient for a competent authority to assess.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent within themselves. The evidential threshold necessary to dismiss adverse effects beyond

reasonable scientific doubt has not been met. This situation calls for the application of the precautionary principle, which prevents a lawful conclusion that the impacts are acceptable.

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

In summary, the combination of information deficiencies, policy conflicts, and unresolved environmental risks indicates that the application is both procedurally and substantively unfit for determination. The competent authority must refuse consent based on these grounds or invoke the necessary regulatory provisions to require the submission of the missing information.

Additional Comments

I recently visited the Faroe Islands where I spent a lot of my time comparing and contrasting those islands with the Western Isles. I was struck by how vibrant and forward looking the Faroese people are, and how invested they are in their own development - the impact of which is clear in the number of young families, the pride in place, the infrastructure and investment in public amenities and heritage. I realised it was the agency they were afforded by their central government - their involvement in decision making to ensure it benefits their community, rather than sating the greed of those in faraway cities.

Put windfarm decision making squarely in the hands of the people who live in the islands. Let entire windfarm earnings be invested back into the communities and give them the power to charge the mainland, or go away.

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: C44C0EB6

Member of the public 1778

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an assessment of the Environmental Impact Assessment Report and associated documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. Situated off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. The design, scale, and proximity of the wind farm proposal raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents missing critical environmental data, limited and inconsistent baseline information, and unclear aspects of the proposal. The flexible design framework inhibits a proper understanding of the likely significant effects, and the unspecified mitigation measures raise doubts about their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which lack robust supporting evidence.

There are evident and serious conflicts with policy. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability from a policy perspective.

The scale of this proposal is unprecedented for the location, with large turbines planned in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive, transparent, or dependable evaluation of the likely environmental effects associated with the proposal. A critical issue is the adoption of a flexible Project Design Envelope, which lacks fixed turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the effective application of a worst-case scenario approach, thus compromising the reliability of the assessment. As a result, the impacts reported may not accurately portray what will be constructed, which obstructs both public understanding and the competent authority's ability to grasp the true scale of environmental effects.

There is a heavy reliance on undefined mitigation measures, monitoring strategies, and management plans within the application. Seeking consent based on the premise that environmental damage will be mitigated at a later date is unacceptable, as it inhibits any substantive evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of critical information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be explicitly identified prior to any determination.

Significant evidential gaps are present, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than robust site-specific evidence. This lack of comprehensive information generates uncertainty about the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are drawn without adequate supporting data. The insufficiency of information hampers the understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it fails to show that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposed application does not adequately assess alternatives, failing to meet the necessary requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured comparison of realistic alternatives based on their environmental impacts, it presents a narrative that outlines the project's evolution. This

method does not show that the developer has appropriately identified, assessed, and selected less harmful options over more damaging ones.

There is a lack of clear and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not prove that the developer has genuinely considered placing turbines further offshore, where the visual, ecological, and coastal effects would likely be less severe. The West Lewis coastline is particularly sensitive, and the critical role of proximity to shore in evaluating impact makes the absence of this analysis significant. Without it, one cannot conclude that the proposed siting is the least damaging option available.

This issue extends to cable routing and landfall assessment, with inadequate evidence that alternative routes have been explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually important sites like Barvas Cemetery. The lack of a clear strategy for avoidance and insufficient comparative analysis suggest that mitigation by design has not been implemented, leading to a reliance on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through thoughtful site selection, layout, and routing of infrastructure. This demonstrates a failure to follow the established mitigation hierarchy and impedes the competent authority's ability to assess whether less harmful and more suitable alternatives exist. The absence of a thorough alternatives assessment raises doubts about whether the proposal is sustainable or compliant with policy.

From a policy standpoint, this shortcoming jeopardises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, further supporting the conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in its assessment of marine ecology and protected species, leading to an unreliable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete. The methodologies used fail to capture the presence, behaviour, and habitat usage of the species accurately, which compromises the evidential foundation necessary for evaluating potential impacts.

One notable oversight is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. By neglecting to assess their core foraging range and behavioural patterns, the potential effects of construction-related disturbance, noise, and increased activity on otters are not properly evaluated. This lack of consideration undermines any assertions regarding the absence of significant

effects on this species.

The assessment also inadequately addresses basking sharks, where reliance on aerial surveys leads to substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to result in an underestimation of the species' presence, especially when compared to land-based observations that indicate regular use of these waters. The failure to incorporate or adequately analyse such pertinent data leads to an incomplete baseline, further weakening the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The insufficient baseline data also hinders meaningful assessments of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, the granting of consent under these circumstances would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings inhibit a comprehensive evaluation of impacts on marine ecology and protected species, ultimately leading to the assertion that the application lacks an adequate evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability due to substantial internal inconsistencies and methodological weaknesses. It is crucial to highlight that the application fails to provide adequate evidence that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. The site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly evaluated.

A fundamental contradiction exists within the application itself; while the developer asserts that there are no significant adverse effects, they simultaneously present a case for Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. Furthermore, the methodologies used in the assessment are likely to underestimate mortality rates, especially for species like Kittiwakes and Fulmars,

where baseline data is lacking and behavioural responses remain unclear.

The positioning of turbines within a recognised migratory corridor presents an additional risk, as it creates a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. There has been insufficient evaluation of the long-term consequences of sustained mortality in this corridor or the potential repercussions on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment represent a failure to adhere to the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that these critical seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is fundamentally flawed, characterised by internal inconsistencies, inadequate methodologies, and a lack of sufficient evidence. These issues collectively hinder a thorough evaluation of impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets rather than recognising their ongoing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice. Despite their continued use and significance, the assessment categorises them as static features, neglecting their ongoing meaning and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The assessment also fails to account for intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are vital to the area's identity yet are

conspicuously absent from the evaluation, representing a significant oversight. Ignoring these factors means that the true cultural impact of the development cannot be accurately assessed.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity recognised as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018, highlights a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This oversight alone hinders a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer’s failure to publish the full Social Impact Assessment is a critical concern that undermines the evaluation of social impacts, health, and wellbeing related to the proposed development. While a Social Impact Assessment was commissioned and included focus groups with local residents, the lack of transparency surrounding this report creates a significant evidential gap. This omission hampers both public understanding and the competent authority’s ability to assess the full extent of social risks identified in the developer’s own research.

Evidence indicates that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts have been derived from direct engagement rather than speculation, yet the withholding of the complete assessment prevents thorough scrutiny of these findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there are indications that the proposal threatens community identity and cohesion, with “cultural loss” highlighted in the developer's findings. Despite this

recognition, such impacts have not been adequately incorporated into the main application or given appropriate consideration. The lack of access to the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency of transparency also compromises the Environmental Impact Assessment process. It is crucial to have a complete understanding of social, economic, and health implications for developments of this magnitude, particularly when community character is at stake. Without the full dataset, the application lacks a comprehensive evidential basis necessary for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avoid harm; however, existing adverse effects are evident and have not been fully revealed. Without the full assessment, compliance with this policy cannot be established.

The procedural consequences of this situation are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements set by the Environmental Impact Assessment framework.

Overall, the combination of the non-disclosure of the full Social Impact Assessment and the existing evidence of adverse impacts renders the assessment incomplete and unreliable. This circumstance obstructs a lawful determination and highlights that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture the extent of change and the sensitivity of the environment. Notably, the West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The planned installation of large-scale turbines near the shoreline would introduce an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The assessment does not sufficiently represent the magnitude of the anticipated visual changes. Due to the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would severely impact visual amenity and diminish the defining characteristics of naturalness and remoteness. Moreover, the assessment fails to adequately convey the level of impact or its significance within such a sensitive landscape.

Concerns also arise regarding the methodology employed in the selection and presentation of visual viewpoints. There is evidence to suggest that these viewpoints

may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

A critical shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, connected through visual and spatial relationships to the Atlantic horizon. The assessment mistakenly treats these as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contravenes the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The degree of change proposed is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

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

In summary, the assessment fails to accurately represent the scale of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline features clean coastal waters and important habitats that are sensitive to disturbances and contamination. The assessment of construction and pollution risks associated with the proposed project is incomplete, lacking the necessary detail to properly evaluate the likely environmental effects. The proposal includes substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be formulated after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

There are acknowledged risks in the application, such as sediment mobilisation and

accidental chemical or oil spills, but it fails to provide enough detail on how these risks will be prevented, controlled, or monitored. Additionally, uncertainty surrounds the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive.

The absence of detailed emergency response procedures further complicates the issue. By postponing contingency planning until after consent, the application makes it impossible to evaluate whether proper safeguards are established to handle pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and required mitigations must be evaluated prior to granting consent; without this information, a lawful determination cannot be made. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts render the assessment materially deficient. These issues prevent 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 current application presents an inadequate assessment of fisheries and marine life, failing to robustly evaluate ecological or socio-economic impacts. There is a significant concern regarding the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are available or can absorb additional pressure, raising the risk of overfishing in other areas, which could have far-reaching economic consequences for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. High-energy hammer piling over an extended duration is likely to disturb marine life across vast distances, notably affecting species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application diminishes the significance of these effects without adequate supporting evidence.

Moreover, there is an evident inconsistency in the application, as it acknowledges the

need for licenses to permit harm to European Protected Species while concurrently describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without an exhaustive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic environment.

From a policy standpoint, the application fails to comply with National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally inadequate and does not take into account the full range of impacts stemming from a project that is inherently unified. The offshore turbines and the onshore works are closely interconnected; however, the separate assessment of these components leads to a disjointed analysis, obscuring the true extent of environmental and socio-economic consequences.

Onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure traversing sensitive landscapes. These activities include excavation in areas of deep peat, particularly within Barvas Moor, which is a crucial carbon store and ecologically important habitat. The application lacks a thorough examination of these impacts, hindering a complete understanding of the project's environmental footprint.

The failure to consider onshore impacts alongside offshore elements prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together, yet the division of onshore and offshore aspects means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Additionally, there are considerable risks posed to sensitive habitats such as machair systems and peatland environments, which are protected under policy. The application does not demonstrate that these habitat impacts have been fully evaluated or that

suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the principles of renewable energy development. This matter is not sufficiently addressed in the application, which fails to show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not provide proof that necessary consents or processes have been initiated, raising serious doubts about deliverability and lawful execution.

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

Ultimately, the separation of project components, the lack of comprehensive assessment, and the absence of evidence on environmental and land use impacts render this portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism, particularly in relation to emerging sectors like astro-tourism. The introduction of permanent red aviation lighting, visible over long distances, would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application does not address the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity, this absence represents a serious gap in the overall landscape and environmental evaluation. Moreover, there is no analysis of the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their sensitivity to phototaxis, which can cause disorientation and increase the risk of collisions. The lack of any lighting impact assessment or phototaxis study means that potential effects on these species remain unexamined.

This situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of

site-specific night-time data creates a critical gap in understanding ecological impacts, making it impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard required to exclude these potential adverse effects cannot be met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasizes the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the ecological framework. Collectively, the absence of assessments related to dark skies and nocturnal wildlife creates a significant evidential gap, resulting in an incomplete application that cannot support a lawful determination.

TOURISM

Tourism has become a cornerstone of the Isle of Lewis economy, growing significantly from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the local economy. However, the assessment of tourism impacts related to the proposed development is severely lacking. It fails to evaluate the economic and social consequences for this vital sector, which is fundamentally dependent on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure would affect visitor numbers, behaviour, or the overall economic contribution.

The omission of a thorough analysis regarding the role of environmental quality in tourism is particularly alarming. Unspoiled landscapes and dark skies are crucial to visitor experience and the growth of emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment further underscores this deficiency, leading to a significant gap in understanding the potential impacts on a recognised and growing part of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic consequences of the proposal adequately.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of

visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency obstructs a robust evaluation of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary requirements for sustainable development. It does not align with statutory duties, national policy, or evidential standards. This proposal repeats the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. Although the current application is presented under a stronger policy framework, it still does not adequately address biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis for determination. The application lacks complete baseline data, relies on an undefined design envelope, and specifies mitigation measures that have not been fully articulated. It omits essential impact pathways concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not provide a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The absence of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018. Furthermore, not disclosing the complete Social Impact Assessment is a significant omission. These deficiencies hinder the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain unclear and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

mitigated to an acceptable level.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C1F508EC

Member of the public 1779

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 is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable account of the anticipated

environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment and making it impossible for both the public and the competent authority to comprehend the actual extent of environmental effects.

Consent for the application is sought primarily on the basis of unspecified mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach defers crucial information to post-consent stages, which is procedurally unacceptable. It conflicts with the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

Furthermore, there are critical evidential deficiencies, including significant gaps in baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially when conclusions about negligible or non-significant effects are made without robust supporting data. Such a lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including stipulations about biodiversity protection and environmental integrity, as it cannot be proven that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects and mean that the competent authority is not positioned to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active marine system that is highly sensitive. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete or reliable understanding of ecological receptors within this area. The baseline data remains incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. This inadequacy results in a lack of a sound evidential basis for evaluating potential impacts.

A significant shortcoming in the assessment pertains to otters, which are classified as a

European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. The core foraging range and behavioural patterns of otters have not been adequately considered, meaning that potential effects from construction disturbances, noise, and increased activity remain unassessed. Consequently, this oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces notable detection bias, particularly given the challenging Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

The methodological limitations evident in the assessment lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding 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 the identification and assessment of protected species are inadequate. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Under these circumstances, granting consent cannot be justified in a lawful manner.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fundamentally flawed in its ornithological assessment, which suffers from significant evidence gaps and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already facing decline. However, the application fails to provide the necessary evidence to show that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the proposed development, yet the assessment does not thoroughly evaluate critical issues such as displacement, collision risk, or habitat loss.

A serious contradiction is evident in the application, as the developer asserts no

significant adverse effects while also arguing a case for Habitats Regulations derogation, a process that is only invoked when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions are not substantiated by the evidence presented. Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of their feeding grounds is not comprehensively addressed, and the reliance on modelling techniques introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, especially when baseline data is incomplete and species behaviours are not fully understood.

The location of turbines within a recognised migratory corridor poses another serious risk, creating a barrier along a primary flight path for birds migrating between the United Kingdom and Iceland. The application lacks a thorough examination of the long-term consequences of ongoing mortality in this corridor and does not consider the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle, thus hindering any lawful conclusion that could support consent.

Collectively, these deficiencies represent a significant failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to conclusively demonstrate that internationally important seabird populations will not face adverse effects places the proposal in direct conflict with national policy. Overall, the assessment's unreliability stems from its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage surrounding the West Lewis coastline is alarmingly insufficient. This area is a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. However, the application adopts a narrow perspective, viewing heritage merely as a collection of isolated and static assets. It neglects to appreciate their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight fails to acknowledge their continued use and the implications of development on their surroundings, leading to an incomplete understanding of cultural

impacts and a disregard for their importance in community life.

Moreover, the assessment completely overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the historical bond between the community and the coastal environment. These aspects are fundamental to the area's identity and are alarmingly absent from the evaluation, indicating a serious gap. Without acknowledging these elements, the true cultural ramifications of the development cannot be comprehensively grasped.

The concerns extend further to community rights and the level of engagement involved. The Gaelic-speaking population embodies a unique cultural identity that aligns with the characteristics of an Indigenous People, yet there has been no implementation of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the credibility of the assessment and contradicts established principles regarding participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment raises a critical procedural concern. This assessment is a legal requirement under the Islands (Scotland) Act 2018, and without it, the competent authority is unable to fulfil its obligations to examine the social, cultural, and economic impacts on the island community. This omission alone is sufficient to obstruct a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The neglect to consider both tangible and intangible heritage, alongside a failure to recognise living cultural practices, signifies a clear deviation from policy requirements.

In summary, the deficiencies in addressing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, and the application lacks a robust foundation for evaluating the genuine cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly lacking and does not adequately capture the degree of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to represent the extent of the visual change. Given their scale and closeness, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity and

diminish the essential qualities of naturalness and remoteness. The assessment does not convey the level of this impact or its significance within the context of such a sensitive landscape.

There are also concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact may have been understated, undermining the assessment's reliability.

Additionally, the assessment does not consider the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, rather than acknowledging their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any claim of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment presented regarding construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. The project entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction

Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be formulated after consent is granted, thereby hindering any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns due to the sensitivity of the affected environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

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

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

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

Overall, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in an assessment that is materially deficient. These issues obstruct a comprehensive evaluation of construction and pollution risks and further reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The 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 lacks a complete assessment of onshore infrastructure, which fails to consider the overall impacts of what is a single integrated project. The offshore turbines are intrinsically linked to the onshore works, yet these elements are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The current application does not provide a thorough assessment of these impacts, limiting a full understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project are considered collectively, but the division of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately addressed.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, highlighting a gap in the evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbing peatland can release stored carbon, leading to a carbon debt that contradicts renewable energy goals. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create an intrusive "wall of light" effect visible over long distances, fundamentally changing the night-time environment of the West Lewis coastline. This area is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and

tourism value. The application lacks any assessment of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors, thereby overlooking the crucial role that dark skies play in the area's identity and in burgeoning sectors such as astro-tourism.

Moreover, there is no evaluation of how this lighting will affect nocturnal wildlife. Sensitive species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk due to phototaxis, which can lead to disorientation and a higher likelihood of collisions. The absence of a lighting impact assessment or a phototaxis study means that the proposal does not consider the potential adverse effects of aviation lighting on these species or the risk of increased mortality.

The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Other species, including Kittiwakes, that may forage or migrate during the night are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. This critical gap in site-specific night-time data prevents a comprehensive understanding of the ecological impacts.

Without an assessment of these nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate no adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 regarding the safeguarding of natural spaces and environmental quality. It diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

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

TOURISM

The analysis of tourism impacts within the application is substantially inadequate and neglects to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism industry relies heavily on the region's wild coastline, almost untouched landscape, dark skies, and the sense of remoteness that these features provide. While the application notes that 86% of visitors are attracted by the scenery, it lacks a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution to the area.

The tourism sector has seen notable growth, with its economic contribution rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and

representing up to 16% of the island's economy. Nevertheless, the proposal does not consider how the potential industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added and overall economic resilience. Without such analysis, it remains uncertain whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment fails to recognise the significance of environmental quality in sustaining tourism, particularly the value of pristine landscapes and dark skies for enhancing visitor experiences, as well as the opportunities presented by emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

Considering the context of an island community with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been scrutinised as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, specifically regarding economic impact and the necessity to illustrate net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, evaluating environmental influences on visitor behaviour, and addressing the island's economic reliance culminate in a significant evidential gap. This shortfall obstructs a thorough assessment of economic effects and contributes to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria of sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This application echoes the primary concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is presented now under a policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet fails to address these critical areas effectively.

Significant gaps exist in the evidential basis necessary for informed determination. The application lacks comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to address key impact pathways such as those affecting nocturnal wildlife, full

onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further highlights material deficiencies that hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals remain incomplete and, in certain areas, inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

This 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, disruptions to cultural and visual relationships, and tourism impacts represent permanent changes that cannot be mitigated to an acceptable degree.

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

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

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 17DA10B5

Member of the public 1780

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 marine licensing and Environmental Impact Assessment regimes. The objection is rooted in an examination of the Environmental Impact Assessment Report and the associated documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich 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.

The application lacks a sufficient evidential foundation for a lawful decision. Essential environmental data is absent, baseline information is not only limited but also inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework employed fails to allow for a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unverified. Consequently, the available documentation does not afford a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust substantiation.

There are evident and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate concerns, and environmental integrity. These conflicts directly impact the statutory requirements for consent and compromise the ability of the competent authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the project, with large turbines positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report suffers from significant deficiencies, leading to an incomplete and unreliable understanding of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity hinders the application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and competent authorities from fully grasping the true extent of the environmental impacts.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be mitigated later obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally inappropriate and conflicts with the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies be clearly identified before determination.

The report also exhibits severe evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn 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 fails to meet statutory requirements.

Consequently, the application does not fulfil the evidential criteria set out in the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not align with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been demonstrated that impacts have been adequately assessed or that suitable safeguards are established.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate. It does not provide a reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system, yet the baseline data is incomplete. The methodologies used fail to adequately

capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant oversight is the failure to properly assess otters, a European Protected Species, and their use of coastal areas for foraging and movement. The application does not consider their core foraging range and behavioural patterns, which means that the potential effects of construction disturbance, noise, and increased activity have not been properly evaluated. This oversight undermines any conclusions regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks has notable deficiencies. The reliance on aerial surveys introduces significant 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 show frequent use of these waters. The failure to incorporate or adequately consider this data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. Moreover, the lack of sufficient baseline data hampers meaningful assessments of cumulative and indirect impacts, such as seasonal variation and interactions within the wider ecosystem. This creates uncertainty about the true risks to marine species and habitats.

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

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies hinder a thorough evaluation of 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 West Lewis coastline represents a living cultural landscape where environment, language, tradition, and community are intricately linked. The assessment of cultural heritage and community identity fails to recognise this connection, adopting a reductive view that treats heritage merely as a collection of static assets. It neglects to acknowledge the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

Cemeteries at Dalmore, Bragar, and Barvas are examples of culturally significant sites that are active places of burial and spiritual practice. However, the assessment

inaccurately categorises them as static features, overlooking their continued use and meaning while failing to consider the impact of development on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it recognise the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the evaluation, representing a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to align with established principles of participation in cultural and environmental decisions.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018, represents a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination of the proposal unlawful.

These shortcomings 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 signifies a clear departure from policy requirements.

Ultimately, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the associated seascape and landscape implications is seriously flawed and does not sufficiently acknowledge the extent of change nor the sensitivity of the receiving environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. Introducing large-scale turbines in proximity to the shoreline would create a significant and ongoing industrial presence, which would fundamentally transform the character of this landscape in a permanent and irreversible way.

Moreover, the proposal fails to accurately portray the magnitude of the anticipated

visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment inadequately reflects the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the actual visual impact has been minimised, which calls into question the assessment's overall reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and affecting their connection to the natural horizon. This is not merely a visual concern; it represents a wider cultural and spatial detriment that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, especially regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further weakens any assertion of policy adherence.

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a credible evaluation and reinforce the position that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry, yet the application inadequately assesses the ecological and socio-economic impacts associated with the proposed development. The failure to protect or maintain these vital habitats raises significant concerns

regarding potential disruption.

A critical issue lies in the assumption that fishing activities may be displaced without consequence. The lack of evidence regarding the availability, accessibility, or capability of alternative fishing grounds to absorb additional pressure is particularly troubling. This gap in the assessment raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. The absence of a clear, evidence-based analysis inhibits an understanding of the true impacts on fisheries and local livelihoods.

Furthermore, the proposal presents considerable risks to marine species, notably due to the underwater noise generated during construction activities. The use of high-energy hammer piling for prolonged periods is expected to cause disturbances across extensive areas, adversely affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Additionally, there exists a contradictory stance within the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously characterising these impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly in light of anticipated harm that warrants legal authorisation.

The assessment further neglects to address cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, the overall ramifications for marine ecosystems and socio-economic conditions remain indeterminate.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist with existing marine users or avoid unacceptable repercussions on marine biodiversity, thus obstructing any conclusion that the proposal embodies sustainable development.

In summary, the deficiencies in the evaluation regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings inhibit a comprehensive understanding of the potential impacts on marine life and fisheries.

TOURISM

The tourism sector on the Isle of Lewis plays a crucial role in the local economy, contributing over £81.5 million and supporting more than 1,000 jobs. This sector accounts for up to 16% of the island's economy and has seen significant growth since 2017. However, the assessment of tourism impacts within the application is materially

deficient, failing to evaluate the economic and social consequences for this key sector.

Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure could impact visitor numbers, behaviours, or the overall economic contribution.

The application also overlooks the importance of environmental quality in supporting tourism, particularly regarding unspoiled landscapes and dark skies. This neglect is further highlighted by the absence of a Dark Skies Assessment, leaving a gap in understanding the impacts on growing sectors such as nature-based tourism and astro-tourism.

In an island community with limited economic diversification, the lack of assessment on tourism impacts raises serious concerns about employment, local businesses, and community sustainability. Furthermore, the omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated as required by the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, evaluate environmental influences on visitor behaviour, and acknowledge the island's economic dependency creates a significant evidential gap. This gap hinders a robust assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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: DF10D958

Member of the public 1781

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

Dear Sir/Madam

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents an assessment of marine ecology and protected species that is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation to evaluate potential impacts effectively.

Notably, the assessment neglects to properly acknowledge the presence of otters, which are classified as a European Protected Species. It fails to assess their active usage of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns results in an inadequate evaluation of potential impacts stemming from construction disturbances, noise, and increased activity. Such omissions compromise the conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, which suffers from a reliance on aerial surveys that introduce considerable detection bias, particularly in challenging Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks when compared to established land-based observations that demonstrate frequent utilisation of these waters. The lack of integration or thorough consideration of such pertinent data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings give rise to conclusions about negligible or non-significant effects that rest on assumptions rather than rigorous evidence. The inadequacy of baseline data also hampers the ability to assess cumulative and indirect impacts meaningfully, including those stemming from seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the real extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. The uncertainty introduced by these deficiencies hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on the ornithological environment, particularly given that it is situated within key foraging

areas and migratory pathways for seabirds. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide adequate evidence that these species will not be adversely affected. The assessment lacks a thorough evaluation of the implications of displacement, collision risk, and habitat loss, which are critical factors in understanding the potential impacts on these birds.

There are fundamental contradictions present in the application itself, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically warranted only where significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the necessary evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully acknowledged, and the modelling approaches employed create uncertainties, particularly for species in severe decline such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately examine the long-term ramifications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold required 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 met. This invokes the precautionary principle and precludes a lawful conclusion that could support consent.

Overall, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a comprehensive 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 proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a living cultural

landscape where environment, language, tradition, and community are interconnected. The application treats heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

There is a significant deficiency in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features. This approach neglects their continued use and meaning, which impacts the understanding of development effects on their setting.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are essential to the area's identity, yet they are completely absent from the evaluation, which is a major omission. Without accounting for these factors, the cultural impacts of the proposed development cannot be fully understood.

There are also important concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as part of Indigenous Peoples, but the absence of a Free, Prior and Informed Consent process undermines the validity of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw is the lack of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to evaluate the social, cultural, and economic effects on the island community. Its absence alone renders a lawful determination impossible.

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

The overall result is a significant evidential gap due to the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations. The cultural impacts of the development have not been adequately evaluated, and the application lacks sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly inadequate. It does not capture the extent of change or 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 remoteness. Introducing large turbines near the shoreline would create a continuous industrial presence, which would

fundamentally change this character and lead to a permanent transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes expected. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and diminish the naturalness and sense of remoteness that the area currently possesses. The assessment fails to articulate this impact or its importance within such a sensitive landscape.

Methodological issues also arise concerning how visual viewpoints have been selected and presented. It appears that these viewpoints do not fully reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and valued landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby reducing the reliability of the assessment.

Moreover, there is a notable failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated features rather than recognising their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and diminishing their relationship with the natural horizon. This represents not only a visual effect but also broader cultural and spatial harm that the application has not adequately addressed.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The level of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario further weakens claims of policy adherence.

Additionally, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. The resultant change is therefore fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed emergency response procedures raises significant concerns regarding the proposal. By placing the responsibility for contingency planning at a post-consent stage, the application hinders the assessment of whether adequate measures will be in place to respond to pollution incidents. This introduces procedural risk and undermines the competent authority's ability to evaluate environmental protection strategies during the determination process.

Furthermore, the assessment of construction and pollution risks is inadequate, lacking the necessary detail to adequately evaluate the likely environmental effects. The project entails considerable seabed preparation and installation work within a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that are to be defined after consent is granted, which precludes any meaningful assessment of their effectiveness or suitability.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty extends to the potential effects on sensitive marine species and habitats identified within the broader assessment context.

The application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills. However, it lacks sufficient detail regarding the methods that will be employed to prevent, control, or monitor these risks, which is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disruption and contamination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation measures are evaluated before consent is granted, as the absence of such information renders a lawful determination unattainable. Moreover, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts creates a materially deficient assessment. These deficiencies inhibit a thorough evaluation of construction and pollution risks and strongly indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented in the application regarding fisheries and marine life is notably inadequate, lacking a thorough evaluation of the ecological and socio-economic impacts involved. The marine environment off the West Lewis coast is home

to a rich array of marine species and supports a vibrant fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from significant disruption.

A critical concern is the assumption made that fishing activities can be displaced without resulting consequences. There is no substantiated evidence provided to suggest that alternative fishing grounds are available or accessible, nor that they could sustain the increased pressure from displaced fishing activities. This significant omission raises the potential for overfishing in other areas, which may yield broader economic repercussions for the local fishing fleet. Consequently, without a transparent and evidence-supported evaluation, the impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, including populations of dolphins. The expected disturbance to a considerable segment of the local bottlenose dolphin population prompts serious concern, yet the application minimizes the importance of these effects without sufficient backing evidence.

In addition, there exists a clear inconsistency within the application where the necessity for licenses to permit harm to European Protected Species is recognised, whilst simultaneously asserting that the impacts are negligible. This contradiction calls into question the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, especially where harm is projected to an extent that necessitates legal authorisation.

Furthermore, the assessment fails to adequately address the cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activity. In the absence of a comprehensive evaluation of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus hindering any determination that the proposal embodies sustainable development.

Ultimately, the lack of evidence concerning the displacement of fishing activities, the underestimation of acoustic impacts, and the internal inconsistencies of the application culminate in an assessment that is both incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not capture the full range of impacts from what is effectively a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet their separate assessments lead to a fragmented understanding that clouds the true extent of the environmental and socio-economic consequences.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically important habitat. Without a thorough evaluation of these impacts, it is impossible to grasp the overall environmental footprint of the project.

By neglecting to assess the onshore impacts or postponing that evaluation, the application hampers the analysis of cumulative effects. The Environmental Impact Assessment process demands that all aspects of a project be reviewed in tandem, yet the disjointed examination of offshore and onshore components obscures the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are serious risks to sensitive habitats, including machair systems and peatland areas, which are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

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

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

The combination of separating project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts makes this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposed project would introduce permanent red aviation lighting, visible from great distances, leading to a disruptive “wall of light” effect across the western horizon, fundamentally changing the night-time landscape.

Furthermore, the application fails to assess how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning considering the role that dark skies play in the region's identity and the potential for growth in tourism sectors such as astro-tourism. The lack of consideration for these impacts indicates a notable deficiency in the overall landscape and environmental assessment.

Additionally, the proposal does not evaluate the effects of artificial lighting on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study means there is no analysis of how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and related risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this has not been evaluated. The lack of site-specific night-time data highlights a significant gap in understanding the ecological consequences.

In the absence of an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be negatively affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, the omission is in conflict with National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. This failure also compromises the broader evaluation of landscape and seascape impacts, as night-time character is a fundamental aspect of the environment.

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

TOURISM

The evaluation of tourism impacts is severely lacking and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The viability of tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions from tourism.

Significantly, tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not simulate how the potential industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a flourishing sector.

Additionally, the assessment neglects the critical role environmental quality plays in enhancing tourism, including the significance of unspoilt landscapes and dark skies for visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts presents broader risks for employment, local enterprises, and the sustainability of the community. The absence of a thorough Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as mandated under the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify tourism impacts, analyse environmental influences on visitor behaviour, and account for the island's economic dependencies leads to a significant evidential void. This gap hinders a thorough assessment of the economic effects and underscores the conclusion that the application is inadequate.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria of sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This application echoes the primary concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is presented now

under a policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet fails to address these critical areas effectively.

Significant gaps exist in the evidential basis necessary for informed determination. The application lacks comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to address key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further highlights material deficiencies that hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals remain incomplete and, in certain areas, inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

This 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, disruptions to cultural and visual relationships, and tourism impacts represent permanent changes that cannot be mitigated to an acceptable degree.

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

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

Additional Comments

I write to object to Spiorad na Mara Offshore Wind Farm. As returning visitor to the Outer Hebrides to enjoy the unspoilt landscapes, solitude and the outstanding natural wildlife this proposal will seriously disrupt this both during construction and also long term. The onshore infrastructure will permanently damage the ancient peatlands to transport power generated across the Island. The Lewis and Harris community will gain nothing from this proposal as their tourist industries which they have strived for years to build and improve will be severely impacted. Tourists are not known to flock to industrial construction sites and areas where the countryside is scarred by civil engineering works. The visitors will find alternative unspoilt places to visit here or abroad and not return to these Islands.

The island is famed for its diverse marine life and the large variety of sea birds all of which will be irreversibly impacted.
The energy generated is surplus to Scotland's renewable requirements now and also in 2050 with a net zero gain for our county
This massive scheme should not be given permission to proceed.

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: B289C913

Member of the public 1782

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The basis of this objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised about the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks a sufficient evidential foundation necessary for a lawful determination. Essential environmental data is absent, and the baseline information presented is both limited and inconsistent, with critical components of the proposal remaining undefined. The flexible design framework employed hinders a clear assessment of significant effects, while the reliance on unspecified mitigation measures prevents any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

There exist significant policy conflicts, as the proposal seems misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and weaken the capacity of the competent authority to determine that the development meets policy acceptance.

Moreover, the magnitude of the proposal is unprecedented in this area, with large turbines positioned perilously close to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unfit for a lawful determination. Under these conditions, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents significant evidential deficiencies, marked by gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. This results in uncertainty about the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that fails to comply with statutory requirements.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed in the future obstructs a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation be clearly delineated before determination.

A flexible Project Design Envelope, without definitive commitments to specific turbine dimensions, layouts, or configurations, injects significant uncertainty and obstructs a consistent application of a worst-case scenario. This compromises the integrity of the assessment, meaning that the impacts outlined may not accurately reflect the development that is ultimately constructed. Consequently, this prevents both the public and the competent authority from grasping the true extent of environmental effects.

In addition, the application fails to meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This 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 cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the evident gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess 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 effects, it presents a narrative about project development. This approach does not show that less harmful options have been properly identified, evaluated, or chosen over more damaging alternatives.

There is a lack of clear and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has seriously examined the possibility of placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be lessened. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact highlight the significance of this oversight, as the absence of such analysis prevents any conclusion that the proposed site is the least harmful.

The issues extend to the assessment of cable routing and landfall, with inadequate evidence showing that alternative routes have been sufficiently investigated to avoid or reduce impacts on sensitive areas. This includes cultural and spiritual sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation through design has not been considered, leading to reliance on mitigation measures after design completion.

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

From a policy viewpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community well-being. The absence of a structured comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been properly evaluated and cannot be legally approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment provided concerning marine ecology and protected species is lacking in crucial areas and fails to offer a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically rich marine system. However, the absence of comprehensive baseline data and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap pertains to otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active foraging and movement in coastal areas. This oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential effects of construction-related disturbances, noise, and increased activity. Such shortcomings undermine any conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such data results in an incomplete baseline, further compromising the reliability of the conclusions reached.

These methodological flaws mean that assertions of negligible or non-significant effects are primarily grounded in assumptions rather than substantiated evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the true scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty involved hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thus activating the precautionary principle. Under these conditions, it is unlawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and lead to the overall determination that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fraught with significant flaws regarding its ornithological assessment, which is riddled with gaps in evidence and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not demonstrate to the required evidential standard that these species will not suffer adverse effects. Key foraging areas and migratory pathways are within the development's location, yet the assessment fails to thoroughly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer claims there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the underlying evidence. Additionally, the assessment lacks sufficient evidence that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on

modelling approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies employed likely underestimate mortality rates, particularly when baseline data is incomplete and behavioural responses are not adequately understood.

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

From a regulatory standpoint, the application does not fulfil the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal at odds 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 lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is markedly deficient, as it overlooks the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interwoven. The application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the handling of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices; however, the assessment treats them merely as static features, failing to account for their continued usage and the implications of development on their surroundings. This misrepresentation leads to an incomplete analysis of cultural effects, disregarding their importance to community life.

Moreover, the application neglects to examine intangible cultural heritage, which includes the Gaelic language, local traditions, and the historical bond between the community and the coastal landscape. These aspects are crucial to the area's identity but are entirely omitted from the assessment, constituting a significant oversight. Without addressing these elements, the cultural ramifications of the development remain inadequately understood.

Concerns extend to community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity, recognised as having characteristics of Indigenous Peoples, yet no Free, Prior and Informed Consent process has been initiated. The lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles of participation in matters concerning cultural and environmental interests.

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

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

In sum, the neglect to evaluate living heritage, intangible cultural significance, community rights, and statutory duties creates a substantial evidential gap. The cultural impacts of the development have not been adequately considered, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the complete Social Impact Assessment is a significant oversight that undermines the entire evaluation process. While they conducted focus groups with local residents, the absence of the full report creates a critical evidential gap, which hampers both public understanding and the competent authority's ability to assess the social risks identified through the developer’s research. This lack of transparency severely impairs the Environmental Impact Assessment, making it impossible to fully grasp the social, economic, and health implications of such a large-scale development.

Residents have already reported measurable levels of stress, anxiety, and concern linked to the proposal's size and proximity, illustrating the immediate impact on the community. These findings are grounded in direct engagement, not speculation, yet the incomplete disclosure of the assessment prevents thorough scrutiny and diminishes the importance of these impacts in the decision-making process.

Additionally, the proposal poses a perceived threat to community identity and cohesion, with indications of "cultural loss" present in the developer’s findings. Regrettably, these impacts have not been adequately reflected in the 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, leaving the application deficient in presenting a complete evidential basis to balance benefits against potential harm.

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

The procedural implications of this deficiency are considerable. The competent authority is unable to perform a comprehensive socio-economic and health evaluation in the absence of the full Social Impact Assessment, representing a material omission within the application. Overall, the combination of the non-disclosure of this critical assessment and the evidence of existing adverse impacts results in an incomplete and unreliable evaluation. This not only prevents a lawful determination but also reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological issues arise in the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a wider landscape setting connected visually and spatially to the Atlantic horizon. The assessment treats these assets in isolation rather than acknowledging their interdependence, resulting in an incomplete analysis of the impacts on their setting

and cultural significance.

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

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. As a result, the change is fundamental and permanent, rather than reducible to an acceptable level through mitigation.

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

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in assessing the impacts on fisheries and marine life. It lacks a thorough evaluation of ecological and socio-economic consequences, particularly given the diverse marine ecosystem and the active fishing industry off the West Lewis coast. The application does not adequately demonstrate that these habitats and uses can be protected or maintained without substantial disruption.

A critical concern is the flawed assumption that fishing activities can be displaced without any repercussions. The absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of absorbing additional pressure is a crucial omission. This gap raises serious risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. The lack of a clear, evidence-based assessment means the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to cause disturbances over extensive distances, significantly affecting species such as dolphins. The potential disruption to a large proportion of the local bottlenose dolphin population is a major concern, yet the application diminishes the importance of these impacts without adequate supporting evidence.

There are evident inconsistencies within the application, where the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises serious questions regarding adherence to the Habitats Regulations, especially where harm is anticipated to an extent necessitating legal authorisation.

Additionally, the assessment fails to take into account cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not align with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This absence of compliance prevents any conclusion that the proposal represents sustainable development.

In summary, the overall lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment all contribute to a conclusion that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The Environmental Impact Assessment notably lacks an evaluation of how this lighting will impact visual amenity, landscape character, and the experience of residents and visitors. Given the significance of dark skies to the local identity and the emerging sector of astro-tourism, this omission represents a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of the impacts on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are highly sensitive to artificial lighting. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including disorientation and increased collision risk, have not been addressed.

The ornithological assessment relies solely on daytime survey data, which fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may

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

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

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

In summary, the complete lack of assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unsuitable for a lawful determination.

TOURISM

The assessment of the proposed development lacks essential detail regarding its potential impacts on tourism, a crucial sector for the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the island has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. This lack of analysis leaves uncertainty as to whether the development would yield a net economic benefit or adversely affect an already thriving sector.

Additionally, the assessment overlooks the significance of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. Emerging markets such as nature-based tourism and astro-tourism are also not addressed. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impacts on a vital segment of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts poses broader consequences for employment, local businesses, and

community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been scrutinised as required under the Islands (Scotland) Act 2018.

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

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic reliance result in a substantial evidential void. This gap hinders a thorough assessment of the economic consequences and contributes to the conclusion that the application is fundamentally incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally inadequate in meeting the criteria for sustainable development as set forth by statutory obligations, national policy, and evidential standards. It echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current proposal, despite being under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to address these critical issues.

Furthermore, the application lacks a comprehensive and reliable evidential foundation for assessment. It presents significant deficiencies in baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and neglects to consider important impact pathways related to nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, inhibiting a thorough understanding of the potential significant effects and residual impacts.

Procedural errors are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as mandated by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment presents a material shortfall, obstructing the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for consideration.

The proposal contravenes the National Planning Framework 4 by not sufficiently demonstrating the protection of biodiversity, natural sites, and cultural heritage. It does not adequately assess health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative

impacts of both offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

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, at times, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would lead to substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and effects on tourism are permanent changes that cannot be mitigated to a satisfactory degree.

In summary, this application is procedurally and substantively unfit for determination. The multitude of information gaps, coupled with conflicts in policy and unresolved environmental uncertainties, impede a lawful and evidence-based decision. The competent authority must reject this application outright or utilise the applicable regulatory measures to require the submission of the necessary information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 48227BC7

Member of the public 1783

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 relevant marine licensing and Environmental Impact Assessment regimes. The proposal raises significant concerns due to its unprecedented scale, with large turbines to be placed in close proximity to the shoreline, which will have implications for landscape capacity, visual dominance, and overall environmental impact. This development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

A comprehensive review of the Environmental Impact Assessment Report and associated documentation has revealed numerous material planning, environmental, cultural, and procedural deficiencies. The application lacks an adequate evidential basis necessary for a lawful determination. Critical environmental data is missing, and the baseline information provided is limited and inconsistent, with many key aspects of the proposal remaining undefined. The adoption of a flexible design framework complicates understanding the likely significant effects of the development, while the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not afford a full or informed understanding of the potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by robust evidence.

Moreover, there are clear and substantive conflicts with existing policy frameworks. The proposal 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 to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and weaken the capacity of the competent authority to determine the development as acceptable in policy terms.

The absence of adequate information, combined with a reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, illustrates that the application is incomplete and unable to support a lawful determination. In light of these concerns, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a complete, transparent, or trustworthy depiction of the likely environmental effects

associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity hinders the ability to consistently apply a worst-case scenario, compromising the assessment's integrity. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, limiting both the public's and the competent authority's capacity to grasp the full extent of environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be addressed later precludes any thorough evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation measures be clearly established prior to determination.

Moreover, there are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where conclusions regarding negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

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

Collectively, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects and result in the competent authority being unable to determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of a thorough and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative detailing the evolution of the project. This method does not

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

Moreover, there is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably 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 mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impacts further highlight the absence of this analysis, which undermines any claims that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to cable routing and landfall assessment, revealing insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been effectively applied, leading to a reliance on post-design mitigation measures instead.

Ultimately, the application does not show that environmental harm has been minimised through the careful selection of site, layout, and routing of infrastructure. This reflects a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. 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 inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a material omission, reinforcing the conclusion that the application has not been properly assessed and is incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species related to the West Lewis coastal environment is insufficient, lacking a complete understanding of the ecological receptors in this biologically active marine system. The baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a reliable evidential basis for evaluating potential impacts.

A notable shortfall in the assessment is its treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise or assess otters' active use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the assessment overlooks the potential impacts of construction-related disturbance, noise, and increased activity,

thereby undermining the conclusions drawn about the absence of significant effects on this species.

Additionally, there are significant deficiencies in the assessment of basking sharks. The reliance on aerial surveys leads to considerable 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 a frequent presence in these waters. The failure to properly incorporate such critical data results in an incomplete baseline, which in turn diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that the conclusions asserting negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of adequate baseline data further hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or the requirements set out in National Planning Framework 4, as the proper identification and assessment of protected species are lacking. The uncertainty generated by these deficiencies prevents any conclusion about adverse effects being made beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These significant deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in its ornithological assessment, which is riddled with gaps in evidence and internal inconsistencies that undermine its conclusions. Seabird populations along the west coast of the Isle of Lewis, which hold international importance and are already experiencing decline, are not adequately protected as the application fails to meet the evidential standard necessary to demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are within the proposed development site, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A striking contradiction arises in the application; the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only needed when significant harm is anticipated. This

inconsistency raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn lack support from the underlying evidence. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment neglects the critical importance of these feeding grounds, and the reliance on modelling approaches adds uncertainty, particularly for species like Kittiwakes and Fulmars that are already in severe decline. The methodologies employed likely underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a substantial risk, effectively acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application falls short in its assessment of the long-term consequences of sustained mortality in this corridor, as well as the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which prohibits reaching a lawful conclusion in support of consent. Additionally, the deficiencies highlighted demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally significant seabird populations will not be adversely affected directly contradicts national policy.

In summary, the assessment's internal inconsistencies, methodological shortcomings, and inadequate evidence render it unreliable. These failures impede a thorough evaluation of the potential impacts and culminate in the conclusion that the application does not fulfil the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is not adequate. It does not recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are connected. The application takes a simplistic approach, viewing heritage as isolated, static assets instead of understanding their ongoing social, cultural, and spiritual roles in the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These places serve as active sites for burial and spiritual practices, yet the assessment classifies them as unchanging features, overlooking their current use and significance, as well as the development's effect on their setting. This misunderstanding leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

The application also neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely missing from the assessment, which is a major oversight. Without considering these factors, it is impossible to fully understand the cultural impact of the development.

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

Additionally, there is a critical procedural failure in the lack of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone prevents a lawful decision.

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

In summary, the failure to evaluate 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 lacks a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application demonstrates a significant deficiency in assessing social impacts, health, and wellbeing, undermining the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included engagement with local residents through focus groups. However, the failure to publish the full report results in a critical evidential gap, obstructing both public understanding and the competent authority's ability to grasp the full extent of the social risks identified by the developer's research.

Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement rather than speculation. Nevertheless, the lack of disclosure of the complete assessment hinders proper scrutiny of these findings and limits the capacity to assess their significance in the decision-making process.

Moreover, there is evidence that the proposed development is viewed as a threat to

community identity and cohesion, with the term “cultural loss” explicitly mentioned in the developer’s findings. Despite this acknowledgment, these impacts have not been adequately integrated into the application or given the necessary weight. The non-disclosure of the full Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency fundamentally compromises the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be at stake. By withholding the full dataset, the application fails to provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and mitigate harm, yet the available evidence highlights existing adverse effects that remain undisclosed. In the absence of the complete assessment, compliance with this policy cannot be validated.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material failure within the application and does not satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, combined with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the argument that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, aspects that are integral to its undeveloped nature. The introduction of large-scale turbines near the shoreline threatens to impose a continuous industrial presence, which would fundamentally alter this unique character. This change would result in a permanent and irreversible transformation of the landscape, overshadowing the natural beauty that defines the area.

Concerns regarding the assessment of visual impacts are significant. The application fails to accurately represent the magnitude of change that would occur. The sheer scale and close proximity of the turbines mean that they would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such dominance would erode the visual amenity and diminish the defining qualities of naturalness and remoteness within this sensitive landscape, yet this level of impact is not adequately conveyed in the assessment.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not sufficiently capture the most sensitive receptors or worst-case scenarios, particularly related to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Moreover, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections to the Atlantic horizon. However, the assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete understanding of how the proposal would impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This is not merely a visual issue; it represents a broader cultural and spatial harm that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of proposed changes contradicts the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any argument for policy compliance.

It is clear that the identified impacts cannot be effectively mitigated. The dominance of the turbines due to their scale, height, and proximity means that their presence would be unavoidable. Consequently, the change would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation measures.

In conclusion, the assessment is inadequate in representing the extent of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans and defined mitigation measures leads to a materially deficient assessment of construction and pollution risks. The proposal, which entails substantial seabed preparation and installation works within a high-energy Atlantic environment, does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be prepared after consent, thereby hindering a meaningful evaluation of their adequacy or effectiveness.

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

resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats, which have already been identified as sensitive in the wider assessment.

The proposal also acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, yet it fails to provide sufficient details on how these risks will be prevented, controlled, or monitored. The sensitivity of the receiving environment, including the West Lewis coastline that supports clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, further heightens these concerns.

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

From a regulatory perspective, this deferral of critical environmental safeguards is inconsistent with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent; if such information is lacking, a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies identified within the assessment, including the lack of detailed management plans, uncertainty regarding potential impacts, and absence of defined mitigation measures, collectively illustrate that the evaluation of construction and pollution risks is inadequate and further support the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application fails to provide a reliable assessment of fisheries and marine life, raising serious concerns about its ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, there is no evidence showing that these habitats can be protected or maintained without significant disruption.

One major issue is the assumption that fishing activity can be relocated without negative consequences. The application does not offer proof that alternative fishing grounds are available or capable of handling the increased pressure. This lack of information is critical, as it risks overfishing in different areas and could have broader economic implications for the local fishing fleet. Without a clear assessment supported by evidence, the effects on fisheries and local livelihoods remain unclear.

The proposal presents notable risks to marine species, especially due to the underwater noise created during construction. The use of high-energy hammer piling for an extended duration is expected to disturb marine life over large areas, particularly impacting species such as dolphins. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious, yet the application downplays these impacts without adequate evidence.

Moreover, there is an inconsistency in the application; it acknowledges the need for licences to permit harm to European Protected Species while simultaneously claiming the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises issues related to compliance with the Habitats Regulations, especially when harm is anticipated to require legal approval.

Cumulative impacts from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities, are not adequately considered in the assessment. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic environment.

From a policy viewpoint, the application does not show alignment with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with current marine users or that it will not cause unacceptable harm to marine biodiversity, thus undermining claims of sustainable development.

The deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies 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 lacks a complete assessment of the onshore infrastructure, failing to consider the full range of impacts from this integrated project. It treats the offshore turbines and onshore works as separate entities, leading to a fragmented evaluation that obscures the overall environmental and socio-economic effects.

Key onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts prevents a clear understanding of the project's environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application hinders the proper assessment of cumulative effects. The Environmental Impact Assessment

process necessitates that all components of a project are examined together, yet the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks also exist for sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, highlighting a clear gap in evidence regarding biodiversity protection.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. There is no evidence that necessary consents or processes have been initiated, raising concerns about the project's deliverability and lawful implementation.

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

In summary, the division of project components, the lack of a comprehensive assessment, and insufficient evidence on environmental and land use impacts make this section of the application incomplete and unreliable, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant oversight. The coastline of West Lewis is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting, which would be visible over extensive distances and create a continuous “wall of light” effect across the western horizon, thus fundamentally changing the night-time environment.

Furthermore, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly notable given the significance of dark skies to the local identity and the growth of tourism sectors such as astro-tourism. The lack of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental assessment.

Additionally, there is no investigation into the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to evaluate how

aviation lighting may affect these species or exacerbate mortality rates.

This gap is exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would experience adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is unmet, thus invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

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

TOURISM

The economy of the Isle of Lewis significantly relies on tourism, which has expanded from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this importance, the application in question fails to adequately assess the potential economic and social impacts on this vital sector. While it is noted that 86% of visitors are attracted by the area's scenery, there is no quantified analysis regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Moreover, the assessment overlooks the critical relationship between environmental quality and tourism. The unspoiled landscapes, dark skies, and sense of remoteness are essential to the visitor experience, particularly for burgeoning sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortfall, leaving a significant void in understanding the implications for an increasingly recognised component of the local economy.

In addition, the absence of a comprehensive Island Communities Impact Assessment means that the economic vulnerabilities tied to tourism have not been thoroughly evaluated, contrary to the requirements set out in the Islands (Scotland) Act 2018. In a community with limited economic diversification, this oversight poses broader risks to

employment, local businesses, and community sustainability. Furthermore, from a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4, especially regarding the necessity for a net economic benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector and fails to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Ultimately, the shortcomings in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and acknowledging the island's economic reliance culminate in a significant evidential gap. This gap hinders a thorough assessment of economic effects, leading to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the standards of sustainable development as mandated by statutory duties and national policy. It mirrors the core problems that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite the current application being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

Crucially, the application lacks a comprehensive and reliable evidential basis. It contains significant gaps in baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits vital impact pathways, including nocturnal wildlife, the full scope of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, leaving the potential significant effects and residual impacts inadequately understood.

There are also evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment constitutes a critical gap. 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 stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it validate that health and wellbeing impacts are acceptable. Furthermore, it fails to show a net economic benefit because of the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, thus obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties persist regarding environmental risks, which could be significant. The

assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

Moreover, the proposal threatens to cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruptions to cultural and visual relationships, alongside impacts on tourism, lead to permanent consequences that cannot be mitigated adequately.

In summary, the application is procedurally and substantively unfit for determination. The myriad information deficiencies, paired with conflicts in policy and unresolved environmental risks, obstruct any lawful and evidence-based decision-making. The competent authority must therefore refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the outstanding information.

Thus, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

This is quite simply unacceptable.

This is one of the most unspoilt, peaceful, scenic areas and your plans (and underlying financial greed) will decimate it. There is a beautiful, relaxed flow to the way of life on Lewis, local traditions and ways of life are preserved. It is unspoilt and should not be decimated for what amounts to human greed at it's core. Profit over people.

Scotland is not even a pindrop on the world's emissions. Get real. Absolutely preposterous to be oblivious to this blindly obvious fact.

Shame on you all, whoever has taken a backhander for this, we despise you and yours.

The risks haven't been balanced and the threat to our birdlife and marine life is immense. Shame on you.

Take it to the firth of firth if you must and destory the vistas from Edinburgh or better still the south of England, we do not want it. Neither residents, nor Scottish people, nor visitors.

Why was and is our voice not heard by those who have agreed this should tentatively go ahead? Democracy overtaken by pure greed and an inflated sense of the delusional self - we, Scotland - are not world leaders, we are a pindop on the world and noone cares nor rates nor our minuscule vastly historic contribution.

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: 8ADAAEAB

Member of the public 1784

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale and design of this proposal, along with its proximity to the shoreline, give rise to significant concerns regarding its compatibility with statutory requirements and national policy, particularly in relation to sustainable development principles.

A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible effects lack robust supporting evidence.

Policy conflicts are evident and substantive. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy discrepancies directly impact the statutory tests necessary for consent and challenge the ability of the competent authority to conclude that the development aligns with policy standards.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presented is inadequate and fails to deliver a comprehensive, transparent, or dependable evaluation of the likely environmental consequences of the proposed development. The approach utilising a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This situation obstructs the consistent application of a worst-case scenario analysis and compromises the integrity of the assessment. Consequently, the impacts detailed may not accurately represent the development that may ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true magnitude of the environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. The request for consent is predicated on the assumption that environmental harm will be resolved at a later date, which precludes any meaningful assessment of the effectiveness of these measures or evaluation of residual impacts. This deferral of essential information to stages following consent is procedurally unacceptable, undermining the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

Significant evidential deficiencies exist within the assessment, including gaps in baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are posited without robust supporting evidence. The insufficiency of information obstructs a clear comprehension of cumulative and worst-case impacts, fostering scientific uncertainty that contravenes statutory obligations.

As a result of these issues, the application does not satisfy the evidential standard set forth under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including mandates related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an ill-defined design envelope, the lack of specified mitigation measures, and the existence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is inadequate and does not fulfil the requirements of the Environmental Impact Assessment regime. The application fails to provide a

structured comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative of project evolution, which does not adequately demonstrate that less harmful options have been properly identified and selected over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis represents a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, providing an incomplete and unreliable understanding of ecological receptors. The methodologies employed do not adequately capture important aspects such as species presence, behaviour, and habitat use. Consequently, the assessment fails to provide a sound evidential basis for evaluating impacts.

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

coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means the potential effects of construction disturbance, noise, and increased activity have not been sufficiently assessed. Such shortcomings undermine any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals significant deficiencies, particularly due to the reliance on aerial surveys that introduce detection bias, especially in Atlantic conditions. This methodological approach likely underestimates the presence of basking sharks when compared to established land-based observations indicating their frequent use of these waters. The failure to incorporate relevant data results in an incomplete baseline, weakening the reliability of the conclusions drawn.

These methodological limitations lead to conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The absence of sufficient baseline data further prevents a meaningful assessment of cumulative and indirect impacts, including seasonal variations and wider ecosystem interactions. This creates uncertainty regarding the true scale of risk to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies prevent a robust evaluation of impacts on marine ecology and protected species, contributing to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable and contains significant gaps in evidence and internal contradictions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, or habitat loss have not been thoroughly evaluated.

There is a notable contradiction in the application. The developer claims that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence.

The evidence provided fails to show that seabirds connected with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding grounds is not properly considered, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate potential mortality, especially since baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and serious risk. It effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

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

The deficiencies noted also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be negatively impacted puts the proposal in direct conflict with national policy.

In summary, the assessment is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, viewing heritage merely as a series of isolated, static assets, without recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to acknowledge the impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards the vital role these sites play in community life.

Furthermore, the application overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, representing a significant omission. Without factoring in these aspects, the cultural impact of the development cannot be understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristic of Indigenous Peoples, yet no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy standpoint, the deficiencies outlined place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the recognition of living cultural practices, signifies a clear departure from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient basis for evaluating the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally flawed, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness, would be irreversibly altered by the introduction of large-scale turbines near the shoreline. This would create a continuous industrial presence that drastically transforms the area’s character.

Moreover, the application inadequately conveys the extent of the visual change. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby negatively affecting visual amenity and compromising the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This shortcoming raises the possibility that the visual impacts have been understated, compromising the reliability of the overall assessment.

Additionally, the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage represents a further deficiency. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. By treating these assets as isolated, the assessment overlooks their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This impact is not limited to the visual realm; it encompasses broader cultural and spatial harm that has not been thoroughly examined in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, particularly in terms of protecting natural places and historic assets. The scale of the proposed changes is incompatible with the imperative to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of compliance with policy requirements.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. The resultant changes are thus fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

Collectively, these deficiencies illustrate that the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. Consequently, this undermines a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises serious concerns due to the incomplete assessment of construction and pollution risks, which lacks the necessary detail to properly evaluate the likely environmental effects. The project plans include significant 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 suggests that mitigation and contingency

measures will be developed after consent is granted, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined measures is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty about the scale and behaviour of sediment plumes that could result from seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This approach introduces procedural risk and 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 of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted, and when such information is absent, a lawful determination cannot occur. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be safeguarded or maintained without experiencing significant disruption. A primary concern is the assumption that fishing activity can be displaced without adverse effects. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of sustaining additional pressure. This omission is critical, as displacement may lead to overfishing in other areas and could have broader economic repercussions for the local

fishing fleet. The impacts on fisheries and local livelihoods cannot be adequately assessed without a clear, evidence-based evaluation.

Moreover, the proposal presents substantial risks to marine species, particularly due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects without sufficient evidence to support such a claim.

Furthermore, the application acknowledges the necessity of licenses to permit harm to European Protected Species, yet simultaneously describes the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding nocturnal wildlife and dark skies represents a significant and material gap in the Environmental Impact Assessment. The West Lewis coastline, known for its exceptionally dark skies, plays a vital role in shaping the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting, which would create a pervasive and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical importance of dark skies to the local identity and the emerging sector of astro-tourism, this omission is particularly concerning. The oversight leads to a significant

gap in understanding the landscape and environmental implications of the proposal.

More alarmingly, there has been no consideration of the impacts on nocturnal wildlife. Specific species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The application lacks any lighting impact assessment or phototaxis study, resulting in an inability to assess how the proposed aviation lighting may adversely affect these species or contribute to mortality rates.

This lack of evaluation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to adequately capture nocturnal activity and associated risks. Species such as Kittiwakes, which may forage or migrate at night, also face the risk of disorientation from artificial lighting, yet this aspect has not been evaluated. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts.

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

From a policy standpoint, these omissions contravene the principles set out in National Planning Framework 4 regarding the protection of natural environments and maintaining environmental quality. Furthermore, they compromise the wider assessment of landscape and seascape impacts, given that the night-time character is an integral aspect of the environment.

In conclusion, the lack of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of sustaining a lawful determination.

TOURISM

The Isle of Lewis has seen significant growth in its tourism sector, with the economic contribution increasing from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application under consideration lacks a thorough assessment of tourism impacts, failing to evaluate both the economic and social consequences for this crucial sector. While it is acknowledged that 86% of visitors are attracted by the area's scenery, there is no quantified analysis regarding how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

The assessment neglects the essential role of environmental quality in sustaining tourism, particularly regarding unspoiled landscapes and dark skies, which significantly

enhance the visitor experience. The omission of a Dark Skies Assessment exacerbates the shortcomings of the evaluation, leaving a substantial gap in understanding the implications for an increasingly important segment of the local economy, such as nature-based tourism and astro-tourism.

In a community that relies heavily on a limited economic base, the failure to evaluate the impacts on tourism has broader repercussions for employment, local businesses, and the sustainability of the community. Furthermore, there is an absence of a compliant Island Communities Impact Assessment, which means the economic vulnerabilities under the Islands (Scotland) Act 2018 have not been properly assessed.

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

Overall, the combination of failing to quantify tourism impacts, neglecting to assess the environmental drivers of visitor behaviour, and disregarding the island's economic dependency leads to a significant evidential gap. This situation hampers a comprehensive evaluation of the economic effects and suggests that the application remains incomplete.

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.

Additional Comments

As a lover (and former resident on Lewis) of the Western Isles particularly the Isle of Lewis I an extremely concerned by the sheer size of the proposed wind farm and its impact during construction and the ongoing impact it will have on all aspects of the islands life.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9D94159B

Member of the public 1785

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, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and its supporting documentation, highlighting deficiencies that are material to planning, environmental, cultural, and procedural considerations. The development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, proximity, and scale of the proposal raise significant concerns about its compatibility with statutory requirements, national policy, and sustainable development principles.

There is a lack of an adequate evidential basis for a lawful determination of the application. Important environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined. The employment of a flexible design framework obstructs a clear understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures complicates the ability to assess their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

Substantive policy conflicts are evident. The proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to illustrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and impede the competent authority's ability to conclude that the development is acceptable from a policy perspective.

In terms of scale, the proposal is unprecedented for this location, with large turbines positioned near the shoreline, which raises 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 demonstrate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, it is imperative that the precautionary principle is applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in the application fails to adequately address the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are closely interconnected. Rather than recognising this dynamic relationship, the application adopts a narrow perspective that reduces heritage to a collection of isolated, static assets, ignoring their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practices; however, they are mischaracterised as static features in the assessment. This oversight fails to take into account their continued use and importance, as well as the potential impacts of development on their settings. As a result, the evaluation of cultural effects is incomplete, neglecting their vital role in community life.

Additionally, the application overlooks crucial aspects of intangible cultural heritage, such as the Gaelic language and local traditions, as well as the enduring relationship between the community and the coastal environment. These elements are fundamental to the identity of the area but are glaringly absent from the assessment. Ignoring these factors compromises the understanding of the cultural impact of the proposed development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population holds a unique cultural identity, recognised as having characteristics of an Indigenous People. However, the application lacks a process of Free, Prior and Informed Consent, which diminishes the credibility of the assessment and fails to adhere to established principles of meaningful participation in decisions that affect cultural and environmental interests.

Moreover, a significant procedural failure is highlighted by 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 assess the social, cultural, and economic impacts on the island community. This omission alone raises questions about the lawfulness of the determination process.

From a policy perspective, these deficiencies directly conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, illustrates a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and compliance with statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately

evaluated, leaving the application without a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful appraisal. The developer has undertaken a Social Impact Assessment that included focus groups with local residents; however, the comprehensive report remains unpublished. This 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 available to the public suggest that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These concerns stem from direct engagement, and thus are not merely speculative. The lack of disclosure regarding the complete assessment limits scrutiny of its findings and hampers the evaluation of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these implications have not been properly integrated into the main application or afforded the appropriate consideration. By withholding the full Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. An understanding of social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functionality are at stake. The failure to provide the complete data set results in the application lacking a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence available indicates pre-existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural consequences of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission within the application represents a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with

evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and supports the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, exemplifies a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to this shoreline would establish a continuous industrial presence, thereby fundamentally altering the existing character and resulting in a permanent transformation of the landscape.

The application fails to adequately capture the magnitude of the anticipated visual change. The size and nearness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and undermining the defining qualities of naturalness and remoteness. Furthermore, the assessment does not convey the level of impact nor its significance regarding this sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of the visual impact has been understated, thereby compromising the assessment's reliability.

Additionally, there is a significant oversight in failing to assess 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 broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their context and cultural significance.

The anticipated industrialisation of the seascape would disrupt these essential relationships, altering the experience of heritage assets and severing their connection to the natural horizon. This represents a visual impact alongside broader cultural and spatial harms that have not been adequately considered in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of change proposed is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inevitable.

The resultant change is thus fundamental and permanent, not reducible to an acceptable level through mitigation efforts.

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interrelatedness 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes significant onshore infrastructure components, such as cabling across protected moorland and the construction of a substation near Stornoway, along with related access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a crucial carbon store and ecologically delicate habitat. The current application lacks a thorough assessment of the environmental impacts resulting from these onshore works, obscuring the true extent of the project's overall environmental footprint.

The onshore and offshore components of this single integrated project are intrinsically linked yet assessed separately. This fragmented approach fails to accurately capture the cumulative impacts on peatlands, habitats, and local communities, thus preventing a proper evaluation of these combined effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, and the current separation of onshore and offshore assessments results in a lack of understanding of the overall consequences.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under policy frameworks. The application does not adequately demonstrate that these habitats have been fully assessed for potential impacts or that effective avoidance measures have been implemented. This evidential gap raises concerns regarding biodiversity protection.

Furthermore, the proposed routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. The application fails to present evidence that the necessary consents or processes for this routing have been initiated, leading to doubts about the deliverability and lawful execution of the project.

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

Overall, the incomplete assessment stemming from the separation of project components, the absence of a comprehensive evaluation of environmental impacts,

and insufficient evidence regarding land use effects render this part of the application unreliable and not suitable for lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, crucial for environmental quality, cultural identity, and tourism, particularly in the context of emerging sectors like astro-tourism. The proposed project introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

The application does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors, despite the critical nature of dark skies to the area’s identity. This failure represents a notable gap in the overall landscape and environmental assessment.

Moreover, there is a lack of evaluation concerning the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototaxis, which can result in disorientation and a heightened risk of collision. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and their mortality rates have not been assessed.

This issue is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The lack of site-specific night-time data creates a serious gap in understanding the ecological impacts.

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

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential part of the ecosystem.

Overall, the lack of evaluation concerning dark skies and nocturnal wildlife presents a considerable evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or the economic contributions overall.

Tourism has seen notable growth, escalating from £65 million in 2017 to over £81.5 million, which has supported more than 1,000 jobs and accounted for as much as 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality might impact the Tourism Gross Value Added and broader economic resilience. The absence of such analysis prevents an informed determination on whether the development would yield a net economic benefit or harm an established and expanding sector.

Moreover, the assessment does not take into account the crucial role of environmental quality in bolstering tourism, particularly regarding the significance of unspoiled landscapes and dark skies to visitor experience, as well as the potential of emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a notable void in understanding the impacts on an acknowledged and burgeoning segment of the local economy.

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

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, and fails to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependencies of the island culminates in a significant evidential gap. This inadequacy obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits significant deficiencies that render it unfit for determination. The application does not fulfil the

requirements for sustainable development as prescribed by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. This new application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these concerns.

Critical gaps in baseline data undermine the evidential basis for determination. The continued reliance on an undefined design envelope and unspecified mitigation measures raises questions about the robustness of the application. Additionally, it omits vital impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are also notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a material omission that prevents the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies collectively contribute to the application being deemed unfit for determination.

The proposal contravenes the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It fails to illustrate that health and wellbeing impacts are acceptable, and it cannot provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been appropriately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are both significant and concerning. The assessments of marine ecology, seabirds, protected species, and marine mammals lack completeness and internal consistency. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is set to induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships pose permanent effects that cannot be adequately mitigated.

In summary, the application demonstrates serious procedural and substantive inadequacies. The combined scale of information deficiencies, along with conflicts with established policy and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses

consent on these grounds or utilises the appropriate regulatory provisions to mandate the submission of the missing information.

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

I am astounded that this development is even planned, when Europe is removing these windmills as technology has moved forward to enable them put “pillars” within cities, countryside, water to generate even more electricity, in a more efficient, ecofriendly manner. But here in Scotland it seems every unused windmill worldwide was bought up in a flash sale to be dumped up here with no thought to environment, local communities, economies.

This particular one, the tallest windmills in the world, 6 miles off coast did not consider the impact on the small communities on the West of the Island. I think the attitude has been that islanders do not matter, there’s lots of holiday lets, most of the population live in Stornoway, it’s an ageing population so let’s put them there! The so called consultation was just to tick a box as there was no proper engagement with people. You think throwing money at a few individuals who sit on boards on the Estates was all that was needed.
But people do live on that West coast, they do work the land, they do supplement income in having holiday pods, places for tents, honesty boxes on their crofts, they love the dark nights and the most amazing skies, they love the spring time and arrival of birds like cuckoo’s, curlews, they love they’re shoreline and cliff walks, they love the safety and security living on that side of the island gives them, they love the community spirit that’s there.
Cost of living is higher on the island so hence people supplementing incomes to make ends meet - that will be impacted when tourist numbers drop off as they will with all these wind farms, as what drew the tourists here in the first place will no longer be there as views distorted, wildlife impacted, sea life to as no more watching for the pods whales/dolphins coming down the coast line.
Safety and security within their homes and daily lives is threatened as up to 5,000 workers are due to descend on the island.
There is no economic benefit to the island with this workforce arriving, only for a few individuals.
There is no net gain for households with any of these developments, no positivity only a lot of negatives that have not been addressed in any consultations, and yet planning now lodged, same issues remain to be addressed and the question is when will they be and when will it stop been about the money giving to the estates or council that will see community benefits as that’s all we hear but not a word in addressing concerns raised.
And I ask that you now properly look at people’s genuine concerns and address these whole heartedly and with clarity before making any decision

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: 48C9B674

Member of the public 1786

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

Dear Sir/Madam

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

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

Policy conflicts are apparent and significant. The proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is a failure to demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and impede the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned close to the shoreline, raises serious issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these concerns, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, and reliable depiction of the anticipated environmental effects of the

proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the application of a worst-case scenario. This compromises the integrity of the assessment, rendering the impacts presented potentially inconsistent with the actual development, thus hindering both public understanding and the competent authority's comprehension of the true environmental repercussions.

Consent is requested with a reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Such an approach results in environmental harm being addressed post-consent, thereby obstructing a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of vital information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly identified prior to determination.

Moreover, the application is characterised by significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions are drawn indicating negligible or non-significant effects without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unsubstantiated that impacts have been comprehensively assessed or that suitable safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application as proposed lacks a thorough assessment of alternatives, which is essential to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible

alternatives based on their environmental impacts, the submission presents a narrative detailing the project's development. This method falls short of demonstrating that less harmful options have been identified, evaluated, and chosen over more damaging alternatives.

There is a clear absence of a transparent, evidence-based comparison regarding offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has adequately considered the option of placing turbines further offshore, where the impacts on visual, ecological, and coastal factors would likely be diminished. The sensitivity of the West Lewis coastline underscores the critical nature of proximity to shore in evaluating impacts, and the lack of such analysis hinders any conclusion that the proposed siting is the least damaging option.

Moreover, the inadequacies also apply to cable routing and landfall assessments. The evidence presented does not convincingly demonstrate that alternative routes have been properly considered to avoid or minimise impacts on sensitive receptors, which include culturally and spiritually significant sites like Barvas Cemetery. The failure to establish a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been implemented, relying instead on mitigation measures that occur post-design.

Consequently, the application does not show that environmental harm has been sufficiently minimised through careful consideration of site selection, layout, and infrastructure routing. This oversight signifies a departure from the established mitigation hierarchy, preventing the competent authority from assessing whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be asserted that the proposal aligns with sustainable practices or complies with policy requirements.

From a policy standpoint, this deficiency jeopardises 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 is a significant omission that leads to the conclusion that the application has not undergone adequate evaluation and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is inadequate and does not deliver a thorough or trustworthy understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically rich. However, the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a strong evidential basis for evaluating potential impacts.

One significant oversight is the treatment of otters, a species protected under European

law. The application does not adequately acknowledge or assess their active use of the coastal areas for foraging and movement. This absence of consideration regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbances, noise, and increased human activity have not been sufficiently evaluated. This flaw undermines any assertions about the absence of significant effects on otters.

Deficiencies also appear in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This is particularly evident when compared to well-established land-based observations that highlight frequent use of these waters. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on solid 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 raises questions about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment process and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that it cannot be confidently claimed that adverse effects are excluded beyond reasonable scientific doubt, which invokes the precautionary principle. Thus, consent cannot be lawfully granted in these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A notable contradiction exists in the application, as the developer claims there will be

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is seriously lacking. It does not acknowledge the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are closely interconnected. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets. This perspective ignores the ongoing social, cultural, and spiritual functions these elements have within the community.

A significant shortcoming is the handling of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These places are active sites of burial and

spiritual practice; however, the assessment wrongly categorises them as static features. It fails to take into account their continued use and the impact of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Moreover, intangible cultural heritage is overlooked. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment are vital to the area's identity yet are entirely absent from the assessment. This gap means the cultural impact of the proposed development cannot be fully understood.

Community rights and engagement also raise concerns. The Gaelic-speaking population embodies a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's validity and disregards established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, there is a critical procedural failure, as a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, has not been conducted. Without this assessment, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination of the proposal unlawful.

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

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted by the developer's own research. Summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement and are not speculative, yet the inability to access the complete assessment prevents proper scrutiny of these findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” identified in the developer’s findings. Nonetheless, these impacts have not been fully incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be compromised.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

The procedural ramifications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application and fails to meet the evidential requirements outlined by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment, obstructing a lawful determination and highlighting that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking, failing to capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its unspoilt Atlantic horizon and a pronounced sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would introduce a continuous industrial presence, fundamentally changing this character and resulting in a permanent alteration of the landscape.

The application inadequately portrays the extent of this visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within such a sensitive landscape.

Concerns are raised regarding the methodology used in selecting and presenting visual viewpoints. It appears that these viewpoints do not adequately reflect the most sensitive receptors or the worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This possibility raises doubts about the accuracy of the visual impact assessment, suggesting it may have been understated.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape that is visually and spatially linked to the Atlantic horizon. The failure to acknowledge their interdependence leads to an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and affecting their relationship with the natural horizon. This represents not just a visual impact, but a deeper cultural and spatial harm that remains unaddressed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The magnitude of change proposed is not aligned with the requirements to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case scenario assessment further weakens any assertions of compliance with policy.

It is evident that the impacts highlighted cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines would ensure that their presence remains dominant and unavoidable. The resulting transformation is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is significantly lacking in detail, failing to adequately evaluate the potential environmental effects. It involves considerable seabed preparation and installation works in a challenging 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 are to be developed after consent, which hinders any meaningful assessment of their effectiveness or adequacy.

This reliance on vague future measures is alarming, particularly in light of the sensitive receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to detail how these risks will be prevented, managed, or monitored.

Moreover, there exists uncertainty about the extent and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the scale, duration, or ecological consequences of these impacts. This uncertainty is extended to potential effects on sensitive marine species and habitats that have already been identified in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a stage after consent, the application obstructs the ability to evaluate whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and their mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements 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 create a materially deficient assessment. These failings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with this application is inadequate and does not provide a thorough evaluation of the ecological or socio-economic impacts involved. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to prove that these vital uses and habitats can be protected or maintained without significant disruption.

A major concern arises from the assumption that fishing activity can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can sustain additional pressure. This is a significant oversight, as such displacement could lead to overfishing in other areas and potentially harm the local fishing fleet’s economic viability. Without a sound and evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, primarily due to the underwater noise produced during construction. The prolonged use of high-energy hammer piling is likely to cause disturbances over large distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local

bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency within the application itself; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction calls into question the reliability of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on 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 indicate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not capture the full range of impacts from what is effectively a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet their separate assessments lead to a fragmented understanding that clouds the true extent of the environmental and socio-economic consequences.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically important habitat. Without a thorough evaluation of these impacts, it is impossible to grasp the overall environmental footprint of the project.

By neglecting to assess the onshore impacts or postponing that evaluation, the application hampers the analysis of cumulative effects. The Environmental Impact Assessment process demands that all aspects of a project be reviewed in tandem, yet the disjointed examination of offshore and onshore components obscures the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are serious risks to sensitive habitats, including machair systems and peatland areas, which are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

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

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

The combination of separating project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts makes this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant alteration poses immediate risks that have not been adequately addressed.

Crucially, the assessment fails to evaluate the impact of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application lacks any lighting impact assessment or phototaxis study, leading to a failure in evaluating how aviation lighting may affect these species or escalate mortality rates.

Moreover, the ornithological assessment is overly reliant on daytime survey data, neglecting the nocturnal activity and associated risks that species such as Kittiwakes face, particularly as they forage or migrate at night. This oversight creates a significant gap in understanding the ecological impacts, as site-specific night-time data has not been collected.

Without a proper evaluation of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites will be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the absence of an assessment concerning dark skies and nocturnal wildlife contradicts National Planning Framework 4, which emphasises the protection of natural spaces and environmental quality. This omission also undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment.

Overall, the lack of any evaluation regarding dark skies and nocturnal wildlife represents a significant evidential gap. The application is incomplete and incapable of supporting a lawful determination due to the absence of baseline data, impact modelling, and species-specific analysis. Immediate action is required to address these critical omissions.

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 proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the critical concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not adequately address these issues.

There are significant deficiencies in the evidential basis required for determination. The application lacks comprehensive baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and the potential tourism effects. As a result, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the incomplete disclosure of the Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failures render the application unsuitable for determination.

The proposal conflicts directly with the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural habitats, or cultural heritage. Additionally, it fails to provide evidence of acceptable health and wellbeing impacts and lacks tourism impact modelling necessary to substantiate any net economic benefit. The assessment of cumulative impacts, both offshore and onshore, has not been adequately conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal are uncertain and could be significant. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The considerable information gaps, alongside policy inconsistencies and unresolved environmental risks, hinder the ability to reach a lawful and evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or require the submission of the missing information.

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

Additional Comments

CO2 is 0.04%and the man made CO3 is 0.016%. There is no climate emergency, it's a hoax. Free energy exists, so stop with the stoneage methodology, that's driven by a fallacy.

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: AE6C278F

Member of the public 1787

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment processes. The objection arises from a review of the Environmental Impact Assessment Report and related documents. It highlights significant deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and design, as these factors challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful determination. Important environmental data is absent, baseline information is insufficient and inconsistent, and vital components of the proposal remain undefined. The use of a flexible design framework does not allow for a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures means their efficacy cannot be evaluated. Consequently, the documents fail to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are notable and significant conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests required for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The proposal's scale is unprecedented for this area, with large turbines sited near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental effects. Overall, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency concerning the environmental effects of

the proposal. A flexible Project Design Envelope is utilised, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces a level of uncertainty that undermines the integrity of the assessment, resulting in impacts that may not accurately reflect the final development. Consequently, both the public and the competent authority are left without a true understanding of the potential environmental consequences.

Furthermore, the application is heavily reliant on mitigation measures and management plans that have yet to be defined. Seeking consent under these conditions means that potential environmental harm is deferred for later consideration, which hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This approach is procedurally unacceptable, as it conflicts with the purpose of the Environmental Impact Assessment regime that necessitates clear establishment of likely significant effects and mitigation prior to determination.

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

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

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and gaps in baseline data culminates in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology and protected species assessment presents significant shortcomings, failing to deliver a complete or dependable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the existing baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for impact

evaluation.

A notable gap is the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly examined, undermining any assertions of negligible effects on this species.

In assessing basking sharks, the reliance on aerial surveys has led to significant detection bias, particularly in Atlantic conditions. This methodology likely underrepresents the species' presence compared to established land-based observations that indicate frequent usage of these waters. The lack of incorporation of such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. Insufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation creates uncertainty about the actual level of risk to marine species and habitats.

Regulatory compliance is also an issue, as the application does not adhere to the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species are lacking. The uncertainty created by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these conditions, lawful consent cannot be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, with major gaps in evidence and inconsistencies that undermine its conclusions. The application does not satisfactorily demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are in decline, will not be adversely affected. This development is sited within critical foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

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

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

The proposed placement of turbines within a recognised migratory corridor presents an additional and considerable risk, effectively obstructing a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application proposes a development that fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are intrinsically connected. The evaluation adopts a reductive view of heritage, treating it as isolated and static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant deficiency in the assessment is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are categorised as static features, overlooking their continued use, meaning, and the potential impact of development on

their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their essential role in community life.

Furthermore, the application neglects to assess intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the assessment, representing a considerable omission. Without considering these factors, the cultural impact of the development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. 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 undertaken. This lack of meaningful engagement undermines the validity of the assessment and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure in the application is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination.

From a policy perspective, these deficiencies conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition of living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment presents a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified through the developer’s own research. This lack of transparency is particularly concerning given that the assessment was commissioned by the developer and included focus groups with local residents. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement, are substantive and should not be dismissed as speculative. The omission of the full assessment limits scrutiny of the findings and their significance in the decision-making process.

Moreover, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer’s findings. However, these crucial impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset prevents the application from offering a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development should foster positive health outcomes and mitigate harm, the existing evidence points to adverse effects that remain undisclosed. Thus, without the full assessment, compliance with the requisite policy cannot be established.

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

In conclusion, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts renders the assessment incomplete and unreliable, preventing a lawful determination and affirming 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 strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it fails to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately convey the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and frequently used coastal locations. This dominance would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of

this impact within such a sensitive landscape context.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of the visual impact has been understated, thereby undermining the reliability of the assessment.

Another significant shortcoming is the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting, visually and spatially linked to the Atlantic horizon. Treating these as isolated assets instead of recognising their interdependence leads to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This presents not only a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy perspective, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment undermines any claims of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail for evaluating environmental effects. Significant seabed preparation and installation works are planned within 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 would only be established after consent, thereby hindering any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures is alarming in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, which are particularly susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it falls short of providing adequate details on prevention, control, or monitoring strategies.

Moreover, there remains significant uncertainty about the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. In the absence of rigorous modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been recognised as sensitive in broader assessments.

Further exacerbating these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs an assessment of whether effective safeguards will be in place to address pollution incidents. This not only introduces procedural risk but also weakens the competent authority's ability to appraise environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set out in the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies be evaluated prior to consent; without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents substantial risks to marine species, particularly due to underwater noise generated during construction activities. The prolonged use of high-energy hammer piling is expected to disturb species, such as dolphins, across large distances. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious; however, the application downplays the significance of these effects, lacking sufficient supporting evidence.

Furthermore, the assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast support both a diverse marine ecosystem and an active fishing industry. Nevertheless, the application does not convincingly demonstrate that these

vital uses and habitats can be preserved without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds exist, are accessible, or can accommodate additional pressure. This significant omission risks overfishing in other areas and may lead to broader economic ramifications for the local fleet. Without a clear, evidence-based assessment, the impacts on fisheries and local livelihoods remain poorly understood.

There are notable inconsistencies within the application regarding the need for licences to permit harm to European Protected Species, which are acknowledged while impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises compliance concerns with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not take into account cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to 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 adequately show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the proposal represents sustainable development.

In light of these deficiencies, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions, the assessment remains incomplete and unreliable. These shortcomings obstruct a robust evaluation of impacts on marine life and fisheries.

TOURISM

The analysis of the economic and social consequences of tourism on the Isle of Lewis is seriously lacking and does not account for the essential role this sector plays in the local economy. Tourism relies heavily on the area's wild coastline, unspoilt landscapes, dark skies, and a sense of remoteness. Despite the application stating that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might impact visitor numbers, behaviour, or overall economic contribution.

Since 2017, tourism has seen substantial growth, increasing from £65 million to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not model the potential effects of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is

impossible to ascertain whether the proposed development would provide a net economic benefit or harm an established and thriving sector.

The assessment neglects to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, leading to a considerable gap in understanding the impacts on this recognised and expanding segment of the local economy.

In a community like the Isle of Lewis, which has limited economic diversification, the failure to evaluate the impacts on tourism has far-reaching implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately assessed as required by the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that influence visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This hampers a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development, as required by statutory duties, national policy, and evidential standards. It mirrors the key concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. This new application, however, is presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided for the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Additionally, the reliance on unspecified mitigation measures and the exclusion of critical impact pathways—such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism—highlight the incompleteness of the Environmental Impact Assessment. Consequently, this assessment does not allow for a comprehensive understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to present the full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues collectively render the application unfit for determination.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further fails to establish a net economic benefit. The cumulative effects of both offshore and onshore components have not been properly assessed, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land inadequately understood.

The environmental risks associated with this proposal remain uncertain and could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent in places. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

Oppose the cheek of a wind farm being built in an area that the area has no benefits from. Ruining a beautiful landscape so people get rich. Put it in your own backyard see how you like it.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D429AC21

Member of the public 1788

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and fails to offer a comprehensive, transparent, or dependable account of the anticipated environmental consequences of the proposal. A significant concern is the utilisation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development ultimately realised, inhibiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Additionally, the application significantly relies on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be managed subsequently obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This approach, which defers critical information to stages post-consent, is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and associated mitigation must be thoroughly established prior to determination.

Evidential shortcomings also persist, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in ambiguity surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without adequate supporting data. The insufficient information available obstructs a clear comprehension of cumulative and worst-case impacts, thereby introducing scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been fully assessed or that suitable safeguards are implemented.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the presence of gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to adjudicate the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is significantly flawed and does not provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its

biological sensitivity and activity, yet the baseline data available is insufficient, and the methodologies employed fail to accurately capture essential details regarding species presence, behaviour, and habitat usage. Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

A notable shortcoming is the inadequate recognition of otters, classified as a European Protected Species. The application does not effectively assess their active utilisation of coastal regions for foraging and movement. This oversight in considering their core foraging range and behavioural tendencies means that potential impacts from construction disturbances, noise, and increased human activity have not been properly evaluated, undermining claims regarding the lack of significant effects on this species.

Additionally, there are shortcomings in the evaluation of basking sharks, primarily due to reliance on aerial surveys, which are prone to significant detection bias under Atlantic conditions. This approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological deficiencies imply that assertions of negligible or non-significant effects are based on assumptions rather than substantiated evidence. The absence of adequate baseline data also hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the overall conclusion that the application does not possess a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. The application fails to demonstrate that these species will not be adversely affected, and this omission is particularly concerning given that the development is situated within key foraging areas and migratory pathways. The ornithological assessment is significantly flawed,

containing considerable gaps in evidence and inconsistencies that undermine its conclusions.

A contradiction exists where the developer asserts there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not underpinned by solid evidence. Furthermore, the assessment does not provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling techniques adds uncertainty, particularly for species like Kittiwakes and Fulmars that are already in severe decline. The methodologies employed are likely to underestimate potential mortality, especially when baseline data is incomplete and the behavioural responses of the species are not fully understood.

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

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to confirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data deficiencies and limitations in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and hinders a lawful conclusion in favour of consent.

Overall, the identified deficiencies signify a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse impacts places the proposal in direct opposition to national policy. In conclusion, the assessment is deemed unreliable due to internal inconsistencies, methodological shortcomings, and insufficient evidence, which together prevent a robust evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to address the cultural heritage and community identity of the West Lewis coastline, which is a dynamic cultural landscape interwoven with environment, language, tradition, and community. It adopts a narrow perspective, viewing heritage merely as disconnected, unchanging assets rather than recognising their vital ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are

not accurately represented in the assessment. These locations are active burial sites and centres of spiritual practice; however, they are wrongly categorised as static features. This mischaracterisation ignores their continued significance, the impact of development on their settings, and leads to an inadequate evaluation of the cultural implications.

Moreover, the assessment neglects intangible aspects of cultural heritage, including the Gaelic language, traditional practices, and the deep-rooted relationship between the community and its coastal environment. These elements are crucial to the area's identity, yet they are entirely omitted from the assessment, which represents a serious oversight. Without these considerations, the true cultural impact of the development remains unexamined.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community, recognised as Indigenous People, has not been afforded Free, Prior and Informed Consent in this process. The lack of meaningful engagement calls into question the validity of the assessment and disregards essential principles of participation in matters affecting cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thereby hindering a lawful determination.

From a policy standpoint, these deficiencies directly contradict National Planning Framework 4, especially regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, illustrates a significant departure from established policy requirements.

In summary, the inadequate assessment of living heritage, intangible cultural values, community rights, and compliance with statutory obligations leads to a substantial evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, thus failing to provide a clear understanding of its true cultural costs.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the complete report has not been made available. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified in the developer’s own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, and these impacts stem from direct community

engagement rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, thereby limiting the capacity to evaluate their significance in the decision-making process.

The application is also seen as a potential threat to community identity and cohesion, with “cultural loss” being highlighted in the developer’s findings. Despite this recognition, these impacts have not been adequately addressed in the main application, nor have they been given the necessary weight. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

Furthermore, this lack of transparency has serious implications for the Environmental Impact Assessment process. It is crucial to have a complete understanding of social, economic, and health impacts for developments of this magnitude, especially when community character and functioning could be jeopardised. By failing to provide the full dataset, the application lacks a comprehensive evidential basis to assess the balance of benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development promotes positive health outcomes and mitigates harm; however, the evidence at hand suggests existing adverse effects that have not been fully disclosed. The absence of the complete assessment renders compliance with this policy unprovable.

The procedural implications of this situation are significant. Without access to the full Social Impact Assessment, the competent authority is unable to conduct a thorough socio-economic and health evaluation. This omission is material and represents a failure to meet the evidential requirements outlined in the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, alongside the documented existing adverse effects, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, fostering a strong sense of remoteness. The proposed large-scale turbines would be positioned near the shoreline, imposing a continuous and dominant industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape.

The application fails to accurately depict the magnitude of the visual change that would occur. The height and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity

and diminishing the naturalness and remoteness that define this environment. This significant level of impact has not been adequately conveyed in the assessment.

There are also serious methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and valued landscapes. Such shortcomings risk understating the true magnitude of visual impact, which compromises the overall reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationship among landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This not only signifies a visual impact but also results in a wider cultural and spatial harm that remains inadequately assessed within the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The proposed scale of change is incompatible with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to provide a thorough worst-case assessment further weakens any assertion of compliance with policy.

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

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

FISHERIES AND MARINE LIFE

The proposed development presents significant concerns regarding its assessment of fisheries and marine life, which is inadequate and fails to offer a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the

application does not adequately demonstrate how these vital uses and habitats can be preserved or maintained without experiencing considerable disruption.

A major issue arises from the presumption that fishing activities can be relocated without repercussions. There is no evidence provided to suggest that alternative fishing grounds are available or suitable to absorb the additional pressure that would result from this displacement. This lack of information is critical, as the risk of overfishing in other areas is heightened, potentially leading to wider economic repercussions for the local fishing fleet. The absence of a clear and evidence-backed assessment obscures the understanding of impacts on both fisheries and local livelihoods.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to create disturbances that reach large distances, which may adversely affect species such as dolphins. The predicted disruption to a considerable portion of the local bottlenose dolphin population raises profound concerns, yet the application downplays these effects without providing sufficient supporting evidence.

Additionally, the application exhibits a notable inconsistency by acknowledging the requirement for licences to permit harm to European Protected Species, while simultaneously claiming that such impacts are negligible. This contradiction undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

The assessment also neglects to consider the cumulative impacts from multiple stressors, including habitat disruption, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to 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, hindering any conclusion that this proposal embodies sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions lead to an assessment that is incomplete and unreliable. These issues impede a thorough evaluation of the impacts on marine life and fisheries.

TOURISM

The evaluation of tourism impacts presented in the application is severely lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The region’s tourism is intrinsically linked to its natural assets, which

include the wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution derived from tourism.

Tourism on the Isle of Lewis has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and environmental degradation on Tourism Gross Value Added, as well as on broader economic resilience. The lack of such analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment disregards the critical role of environmental quality in bolstering tourism, particularly the significance of unspoiled landscapes and dark skies in shaping visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and expanding component of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate tourism impacts bears wider implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been appropriately considered, contrary to the requirements set forth by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity of proving a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and recognising the island's economic dependencies culminate in a considerable evidential gap. This hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards necessary for sustainable development when evaluated against relevant statutory duties and national policies. This situation mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Presently, the application is submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection,

landscape integrity, and community wellbeing.

The application lacks a reliable and complete evidential basis for decision-making. It is marked by significant gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a comprehensive understanding of the likely significant effects and residual impacts.

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

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not effectively demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to provide evidence that health and wellbeing impacts are acceptable, or that there is a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are both incomplete and, at times, inconsistent. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

Moreover, the proposal is poised to induce considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and adverse impacts on tourism are all permanent consequences that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

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

Additional Comments

Scotland already suffers from the over-deployment of wind farms.
There is no need for this development from yet another foreign energy company. This will further damage our world class natural heritage. As custodians of this fragile heritage, we owe to future generations to protect it from exploitation for shareholder profits.

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: 8301D7E6

Member of the public 1789

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. My concerns arise from a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, which reveal serious deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is set to take place off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The scale and design of this proposal raise urgent questions about its adherence to statutory requirements, national policy, and the principles that underpin sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, with a flexible design framework inhibiting a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation inadequate for a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident as well. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4. This inconsistency is particularly prominent concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application fails to prove that it meets national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to assess the acceptability of the development within policy parameters.

The scale of this proposal is unprecedented for this area, with large turbines being positioned alarmingly close to the shoreline, thereby raising significant concerns about the landscape's capacity, visual impact, and overall environmental effects. When considered collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy all indicate that the application is incomplete and unfit for a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not deliver a full, transparent, or dependable account of the potential environmental effects associated with the proposal. The flexible Project Design Envelope employed in the application, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, hindering both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Furthermore, the application is predominantly dependent on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any substantial evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Additionally, there are significant evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, especially in cases where negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or appropriate safeguards implemented.

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

ASSESSMENT OF ALTERNATIVES

The application fundamentally fails in its assessment of alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives

based on their environmental effects, it presents merely a narrative account of the project's evolution. This method does not adequately demonstrate that the developer has identified, assessed, and selected less harmful options over more damaging ones.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not show that the developer has given serious consideration to placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be diminished. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in impact assessment, the absence of such analysis casts doubt on whether the proposed siting is indeed the least damaging option.

The shortcomings extend to the assessment of cable routing and landfall, where there is insufficient evidence of a thorough exploration of alternative routes to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the application has not applied mitigation by design but instead relies on post-design mitigation measures.

Consequently, the proposal does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This reflects a disregard for the established mitigation hierarchy, hindering the competent authority's ability to determine whether more suitable, less harmful alternatives might exist. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment represents a significant omission that leads to the conclusion that the application has not been adequately evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposal under consideration lacks a comprehensive assessment of marine ecology and protected species, which is essential for understanding the ecological receptors within the West Lewis coastal environment. This region is recognised as a highly sensitive and biologically active marine system. However, the data available is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of various species. Consequently, the assessment does not provide a reliable evidential basis for evaluating potential impacts.

Notably, the assessment fails to properly identify and assess otters, which are a European Protected Species. There is insufficient recognition of their active use of coastal areas for foraging and movement, and the core foraging range and behavioural

patterns of otters have not been adequately considered. This lack of detail means that the potential impacts of construction disturbance, noise, and increased activity on otters have not been thoroughly assessed, undermining any conclusions about the absence of significant effects on this species.

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

The methodological limitations present mean that conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been a failure to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the conclusion that adverse effects can be excluded beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented within the application is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate to the necessary evidential standard that these species will remain unaffected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment fails to effectively evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental contradiction in the application, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats

Regulations derogation case, which is only relevant in instances where significant harm is anticipated. This inconsistency raises questions regarding the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence to conclude that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not adequately acknowledged, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, especially where baseline data is lacking and the behavioural responses of these species are not fully understood.

The placement of turbines within a known migratory corridor poses an additional and considerable risk, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality within this corridor or consider the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion in support of consent. The identified deficiencies also demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as an active cultural landscape where the environment, language, tradition, and community are interlinked. Rather than acknowledging the dynamic social, cultural, and spiritual functions of heritage, the application treats it as a collection of discrete, unchanging assets.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment regards them merely as static features, overlooking their ongoing use, significance, and the implications of development on their surroundings. This mischaracterisation leads to an incomplete

understanding of cultural impacts and neglects their integral role in community life.

Moreover, the assessment does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding connection between the community and its coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the evaluation, representing a considerable gap. The absence of these considerations means that the cultural implications of the proposed development cannot be accurately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community possesses a distinct cultural identity, akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the validity of the assessment and neglects established principles of participation concerning cultural and environmental decisions.

Additionally, a critical procedural oversight is the failure to conduct 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. This absence alone renders any determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the safeguarding of historical assets and locations. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, signifies a clear violation of policy stipulations.

Ultimately, the lack of assessment concerning living heritage, intangible cultural values, community rights, and statutory duties culminates in a substantial evidential void. The cultural ramifications of the proposed development have not been adequately explored, and the application lacks a robust foundation for assessing the true cultural costs associated with the project.

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 proposed introduction of large-scale turbines in close proximity to the West Lewis coastline raises significant concerns regarding its impact on the seascape, landscape, and visual amenity. This area is defined by its open Atlantic horizon, undeveloped character, and strong sense of remoteness. The planned industrial presence would create a continuous and dominant feature, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

The application inadequately represents the magnitude of the visual change that would occur. The scale and proximity of the turbines 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 level of impact

and its significance in relation to the sensitive landscape have not been properly conveyed in the assessment.

Methodological concerns further undermine the application, particularly regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the actual magnitude of visual impact has been understated, thereby affecting the reliability of the assessment.

Moreover, the assessment neglects to evaluate 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 application treats these assets as isolated, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which calls for the protection of natural places and historic assets. The scale of proposed change is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further questions any claims of compliance with policy.

It is apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a change that is fundamental and permanent, rather than amenable to reduction through mitigation efforts.

Collectively, these deficiencies highlight the assessment's failure to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. This inadequacy prevents a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment concerning construction and pollution risks lacks the necessary detail to adequately evaluate the likely environmental effects of the proposal. The project involves extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on

mitigation and contingency measures that are to be formulated after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, especially given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient detail on the prevention, control, or monitoring of these risks.

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, determining the extent, duration, or ecological effects of these impacts is impossible. This uncertainty also extends to the potential effects on marine species and habitats 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 respond to pollution incidents. This approach introduces procedural risk and compromises the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; the absence of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not convincingly demonstrate that these vital uses and habitats can be preserved or maintained without considerable disruption.

A critical concern lies in the assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence to suggest that there are alternative fishing grounds that are available, accessible, or capable of accommodating

additional pressures. This is a notable omission, as displacement could lead to overfishing in other areas, which may have far-reaching economic consequences for the local fishing fleet. Without a clear, evidence-based assessment, it remains difficult to grasp the impacts on fisheries and livelihoods.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction activities. The high-energy hammer piling over an extended duration is likely to disturb marine life across considerable distances, affecting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious issues, yet the application underplays these impacts without sufficient supporting evidence.

There is a noticeable inconsistency in the application regarding the need for licences to authorise harm to European Protected Species. While this need is recognised, the impacts are concurrently described as negligible. Such contradictions undermine the credibility of the assessment and raise questions about compliance with the Habitats Regulations, especially in instances where harm may necessitate legal authorisation.

Moreover, the assessment does not adequately address cumulative impacts arising from 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 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 prove that the development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes onshore infrastructure that is assessed separately from the offshore turbines, which are intrinsically linked to it. This fragmented assessment fails to account for the full extent of environmental and socio-economic impacts, obscuring the true scale of the project's effects. Onshore works involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities will require excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the distinct assessment of offshore and onshore elements results in a failure to fully understand the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks posed to sensitive habitats such as machair systems and peatland environments, which are protected under current policy. The application has not shown that impacts on these habitats have been thoroughly assessed or that adequate avoidance measures have been proposed. This leads to a significant evidential gap regarding biodiversity protection.

The proposal raises further concerns about carbon balance, as the disturbance of peatland could release stored carbon, potentially generating a carbon debt contrary to the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains beneficial.

Moreover, the routing of infrastructure through active croft land could conflict with existing land use and legal rights. The application does not provide evidence that necessary consents or processes have been initiated, casting doubt on its deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical gap. The West Lewis coastline boasts exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value. The proposed installation of permanent red aviation lighting, visible over long distances, would create a persistent and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This is particularly concerning given the importance of dark skies to the area's identity and the burgeoning tourism sectors, such as astro-tourism. The failure to consider these factors results in

an evident gap in the overall landscape and environmental assessment.

More alarmingly, there has been no evaluation regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or potentially increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects to account for nocturnal activity and related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, a risk that has yet to be assessed. The absence of site-specific night-time data creates a crucial deficit in understanding the ecological impacts.

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

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the protection of natural spaces and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

Collectively, the absence of assessments concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The assessment provided on the impacts of tourism is fundamentally lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis's economy. Tourism thrives on the region's wild coastline, near-pristine landscapes, dark skies, and a profound sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not offer any quantitative analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Significantly, the tourism sector has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, with more than 1,000 jobs supported and accounting for up to 16% of the island's economy. However, the application neglects to model the potential impacts of seascape industrialisation and environmental degradation on

Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it remains unclear whether the proposed development would provide a net economic benefit or harm an already established and flourishing sector.

The assessment fails to recognise the critical role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the implications for a recognised and expanding segment of the local economy.

For an island community that lacks extensive economic diversification, the inadequate evaluation of tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community as a whole. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been assessed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding the economic impact and the necessity to establish a net benefit. Furthermore, it contradicts strategic objectives that identify tourism as a priority growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough assessment of economic effects, ultimately leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was established. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in numerous critical areas.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, and a lack of specified mitigation measures. Additionally, key impact pathways have been omitted, including those concerning nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to enable a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority from accurately assessing impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

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

Uncertainties regarding environmental risks remain significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Furthermore, 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, and the disruption of cultural and visual relationships, alongside impacts on tourism, represent permanent effects that cannot be mitigated to an acceptable level.

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

It is therefore formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 916C7FD5

Member of the public 1790

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

Dear Sir/Madam

This objection is formally submitted against the proposed Spiorad na Mara Offshore Wind Farm application, which has been put forward under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. This development raises profound concerns regarding its compatibility with statutory requirements, national policy, and the principles underpinning sustainable development, given the unprecedented scale and proximity of the large turbines to the shoreline.

The Environmental Impact Assessment Report and its supporting documentation exhibit material deficiencies, lacking critical environmental data while presenting limited and inconsistent baseline information. Key components of the proposal remain undefined, leading to an unclear understanding of the likely significant effects. Furthermore, the use of a flexible design framework impedes the ability to assess the effectiveness of mitigation measures that have not yet been specified. Consequently, the documentation fails to provide a thorough or informed understanding of the potential environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

Clear conflicts with existing policies are evident. The application 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 mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests required for consent and impede the competent authority's ability to determine the proposal's acceptability in policy terms.

The cumulative effect of insufficient information, reliance on undefined mitigation, evidential shortcomings, and blatant policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent

application of a worst-case scenario. This situation compromises the assessment's integrity, making it difficult for both the public and the competent authority to grasp the true extent of environmental impacts.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is being requested with the expectation that environmental harm will be managed at a later stage. This approach hinders a meaningful evaluation of the measures' effectiveness and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and the use of assumptions rather than site-specific evidence. These issues create uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

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

In summary, the dependence on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal in question lacks an adequate assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. It does not provide a structured or reasoned comparison of viable alternatives based on their environmental effects. Instead, the application offers a narrative that outlines the project's evolution, which does not adequately demonstrate that less harmful options have been appropriately identified, evaluated, and selected over more damaging alternatives.

There is a noticeable absence of transparent, evidence-based comparisons regarding

alternative offshore locations, development scales, or design configurations. The application notably does not show that the developer has adequately considered the possibility of situating turbines further offshore, a measure that could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, coupled with the crucial significance of proximity to shore in assessing impact, the lack of such analysis undermines any claim that the proposed siting is the least damaging option available.

These inadequacies extend to the assessment of cable routing and landfall, wherein there is insufficient evidence suggesting that alternative routes have been properly investigated to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy, along with the lack of comparative analysis, suggests that there has been no application of mitigation by design, relying instead on measures that would occur post-design.

Consequently, the application does not adequately illustrate that environmental harm has been minimised through careful site selection, layout decisions, and routing of infrastructure. This represents a significant failure to adhere to the established mitigation hierarchy, inhibiting the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough assessment of alternatives, it cannot be concluded that the proposal is either sustainable or compliant with relevant policy frameworks.

From a policy standpoint, this deficiency calls into question compliance with National Planning Framework 4, particularly with regard to the protection of natural areas, cultural heritage, and the wellbeing of the community. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall finding that the application has not been thoroughly assessed and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is deeply flawed. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. This deficiency undermines any valid evaluation of potential impacts.

Particularly concerning is the omission of otters, a European Protected Species, which have not been properly recognised or assessed for their active use of the coastal areas for foraging and movement. The lack of consideration of their core foraging range and behaviour raises significant concerns about the potential effects of construction disturbances, noise, and increased activity. Consequently, this oversight compromises the conclusions drawn about the absence of significant effects on this species.

In addition, the assessment of basking sharks is inadequately addressed, relying on

aerial surveys that introduce considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. This failure to incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that the findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which includes seasonal variations and interactions within the broader ecosystem. This uncertainty clouds the true scale of risk posed 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 protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, lawful consent cannot be granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. Such deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant gaps and inconsistencies that undermine its findings. It is crucial to note that the development is situated within key foraging areas and migratory pathways for seabirds. However, the application does not provide adequate evidence to show that these internationally important seabird populations, many of which are in decline, will not be adversely affected. There is a lack of robust evaluation regarding the potential risks of displacement, collision, and habitat loss.

Moreover, a fundamental contradiction arises within the application, which states there will be no significant adverse effects while simultaneously putting forward a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated. Such inconsistency raises doubts about the reliability of the assessment, suggesting that its conclusions are not well-supported by the available evidence.

The assessment fails to adequately demonstrate that seabird species linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of these feeding areas is not fully acknowledged, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, particularly given the incomplete

baseline data and the lack of understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses a significant risk. This situation creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not thoroughly consider the long-term effects of sustained mortality in this corridor or the implications for species with relatively small global populations.

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

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues prevent a thorough evaluation of impacts and ultimately contribute to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, particularly in its failure to recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual significance of heritage, the application adopts a reductive perspective, viewing it merely as a collection of isolated and static features.

A notable shortcoming in the assessment is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites function as active burial grounds and centres of spiritual practice; however, the evaluation treats them as unchanging elements, neglecting their contemporary use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, failing to acknowledge the cemeteries' role within the life of the community.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These aspects are vital to the area's identity and are conspicuously absent from the assessment, representing a critical omission. Consequently, the true cultural ramifications of the development cannot be accurately

assessed without addressing these factors.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions impacting cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018, represents a significant procedural lapse. Without this assessment, the competent authority cannot fulfil its statutory obligation to evaluate the social, cultural, and economic consequences for the island community, thereby hindering a lawful determination.

From a policy standpoint, these inadequacies place the proposed development at odds with National Planning Framework 4, particularly concerning the preservation of historic sites and assets. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, constitutes a clear deviation from policy directives.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the proposed development remain inadequately evaluated, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the development is significantly lacking in transparency and substance. Although the developer commissioned a Social Impact Assessment that included local resident focus groups, the full report has not been made available. This omission creates a critical evidential gap, limiting public understanding and hindering the competent authority's ability to evaluate the social risks identified in the developer’s own research.

Summaries that are available indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are the result of direct engagement with the community and are not based on speculation. However, the absence of the complete assessment restricts thorough scrutiny of these findings and undermines efforts to assess their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with the developer’s findings indicating a risk of “cultural loss.” Despite these serious concerns, the full impacts have not been adequately addressed in the main application, nor have they been given the appropriate

consideration. The failure to disclose the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is vital, particularly when community character and functioning might be affected. The failure to provide the complete data set results in the application lacking a solid evidential foundation necessary for weighing the benefits against potential harms.

From a policy viewpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm. The evidence currently available suggests existing adverse effects that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is impossible.

Procedurally, the implications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a substantial omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding the seascape, landscape, and visual impacts is significantly lacking, failing to adequately reflect both the extent of change and the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoilt open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, they would establish a continuous and overpowering industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently convey the scale of visual changes that would occur. The size and close proximity of the turbines are such that they would overshadow views from residential areas, historic sites, and popular coastal locations. This situation would directly impact visual amenity, diminishing the intrinsic qualities of naturalness and remoteness that define the area. The assessment does not adequately express the severity of this impact or its significance within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately

represent the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and landscapes of high value. This oversight raises the possibility that the magnitude of visual impact has been minimised, thereby undermining the reliability of the assessment process.

Another critical gap is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape threatens to sever these important relationships, altering how heritage assets are experienced and disrupting their ties to the natural horizon. This scenario presents not merely a visual impact but a wider cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly in its aim to protect natural places and historic assets. The magnitude of change proposed is at odds with the imperative to safeguard landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to adequately assess construction and pollution risks, resulting in an incomplete evaluation of likely environmental effects. It proposes significant seabed preparation and installation works in a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on future mitigation and contingency measures to be created after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance

and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies.

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

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders evaluation of whether adequate safeguards are in place to respond to pollution incidents. This situation introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, detailed management plans, and uncertainty about potential impacts culminate in a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of robust evaluation regarding fisheries and marine life, failing to adequately assess the ecological or socio-economic impacts that may arise from the proposed development. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not convincingly demonstrate how these critical habitats and industries can be preserved or sustained without considerable disruption.

One significant issue lies in the assumption that fishing activities can be displaced without repercussions. The absence of evidence indicating that alternative fishing grounds are both available and capable of accommodating the added pressure is a critical flaw. This oversight has the potential to lead to overfishing in different areas, which could adversely affect the local fishing fleet's economic stability. Without a thorough and evidence-based evaluation, understanding the impacts on fisheries and livelihoods remains elusive.

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

the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is expected to disturb marine life across large distances, notably impacting species such as dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious concerns; however, the application tends to minimise the significance of these impacts without adequate supporting evidence.

There exists an inconsistency within the application itself, acknowledging the requirement for licences to permit harm to European Protected Species while simultaneously describing such impacts as negligible. This contradiction calls into question the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially given the anticipated harm that may necessitate legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts that could arise from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby undermining any assertion that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies renders the assessment inadequate and unreliable. These deficiencies hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning onshore infrastructure is significantly lacking, failing to account for the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are inherently connected; however, they are being evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic consequences.

The onshore elements involve the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of associated access infrastructure through delicate landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically sensitive area. The application does not deliver a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's overall environmental footprint.

By choosing to exclude or postpone the evaluation of onshore impacts, the application

undermines the ability to adequately assess cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be considered collectively. Nonetheless, the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain insufficiently understood.

Additionally, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application fails to prove that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, thus creating a significant evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance. The disruption of peatland is likely to release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or establish that the overall carbon balance is beneficial.

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 started, which raises doubts about the feasibility and lawful implementation of the proposal.

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

In summary, the separation of project components, the lack of a comprehensive assessment, and the absence of evidence regarding environmental and land use impacts render this segment of the application incomplete and untrustworthy, thereby impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

Moreover, the application neglects to assess how the proposed lighting may affect

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

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

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

TOURISM

The assessment of tourism impacts associated with the application is significantly inadequate, failing to address the economic and social repercussions for a vital sector within the Isle of Lewis economy. It is critical to acknowledge that tourism relies heavily on the region's wild coastline, almost untouched landscapes, dark skies, and a prevailing sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it neglects to provide a quantified evaluation regarding how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nonetheless, the application does not adequately model the potential impacts on Tourism Gross Value Added or the broader economic resilience stemming from the industrialisation of the seascape and a decline in environmental quality. Without such a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or pose a threat to an established and expanding sector.

Furthermore, the assessment disregards the critical role of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences, alongside emerging markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable void in understanding the effects on a recognised and evolving segment of the local economy.

Given that the island community has limited economic diversification, the lack of an impact assessment on tourism holds broader implications for employment, local enterprises, and community sustainability. The failure to produce a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as mandated under the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify the impacts of tourism, evaluate environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This shortcoming obstructs a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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 am writing to formally object to the proposed Spiorad na Mara offshore windfarm.

This development raises serious concerns that, in my view, have not been adequately addressed in the current documentation.

Firstly, there remain unresolved questions regarding the cumulative environmental impact on marine ecosystems. The scale and location of the project risk disturbing sensitive habitats, with potential long-term consequences for biodiversity, fisheries, and the wider coastal economy that depends on them.

Secondly, the visual and landscape impact should not be underestimated. This coastline is a valued natural asset, central to local identity, tourism, and wellbeing.

Industrialising this seascape would cause irreversible change that cannot be mitigated once implemented.

Thirdly, there are legitimate concerns around noise, including low-frequency and infrasound emissions. While the evidence base is still developing, precaution should guide decision-making where uncertainty exists—particularly when potential effects on human health and marine life are not fully understood or conclusively ruled out.

Finally, I am concerned that community voices have not been given sufficient weight. Developments of this magnitude must demonstrate clear, transparent engagement and genuine local consent, rather than proceeding amid significant public unease.

In summary, I urge the council to apply the precautionary principle and reject this proposal in its current form. Renewable energy must be pursued responsibly, in locations and ways that do not impose disproportionate environmental, social, or economic costs on local communities.

Thank you for your consideration.

Yours sincerely,

Greig Silver

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: 0F499E48

Member of the public 1791

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns have been raised regarding the proposal's scale, proximity, and design in relation to compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a legal determination. There is missing critical environmental data, while the baseline information provided is both limited and inconsistent, with important elements of the proposal remaining undefined. The application employs a flexible design framework, which obscures the understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures hampers any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering the assertions of negligible or non-significant effects unsubstantiated by solid evidence.

There are evident and significant conflicts with established policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory tests necessary for obtaining consent and challenge the capacity of the relevant authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines planned in close proximity to the shoreline, raises major issues regarding landscape capacity, visual impact, and overall environmental consequences. In summary, the lack of adequate information, the dependence on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a thorough and transparent account of the potential environmental consequences associated with the proposal. The incorporation of a flexible Project Design Envelope, which lacks commitment to defined turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the reported impacts may not accurately reflect the final development, leaving both the public and the competent authority uninformed about the true environmental implications.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be managed in the future, the opportunity for a meaningful evaluation of effectiveness or assessment of residual impacts is severely limited. Deferring crucial information to post-consent stages is not procedurally acceptable and contradicts the purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be clearly established before any determination can be made.

Furthermore, there are critical evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts, fostering scientific uncertainty that fails to align with statutory obligations.

Consequently, the application does not meet the evidential criteria stipulated under 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. Moreover, the proposal does not demonstrate alignment with National Planning Framework 4, including stipulations related to biodiversity preservation and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that proper safeguards are in place.

When considered collectively, the reliance on an ambiguous design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report untrustworthy and incomplete. These flaws preclude a lawful and thorough assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the information currently provided.

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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is deeply flawed and overlooks the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intertwined. The application simplifies heritage to a collection of isolated, unchanging features and neglects to recognise their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is how culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are treated. These locations serve as active burial and spiritual sites, yet the assessment fails to acknowledge their continued use and significance, instead reducing them to static features. This misrepresentation leads to an inadequate understanding of cultural impacts and ignores their integral role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage such as the Gaelic language, local traditions, and the enduring relationship the community has with the coastal environment. These elements are vital to the area's identity and their exclusion signifies a considerable oversight. Without incorporating these factors, the true cultural impact of the development remains unmeasured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population possesses a unique cultural identity that aligns with Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process conducted. This lack of genuine engagement undermines the validity of the assessment and fails to honour established principles of participation in decisions that affect cultural and environmental matters.

A significant procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the responsible authority cannot meet its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This alone hinders a lawful decision.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, specifically regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy mandates.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a considerable evidential void. The cultural ramifications of the development have not been thoroughly examined, and the application fails to furnish a solid foundation for understanding the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a comprehensive assessment of social impacts, health, and wellbeing, which is crucial for a lawful evaluation. Despite the developer commissioning a Social Impact Assessment that involved local residents in focus groups, the full report has not been published. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted by the developer’s own research.

Summaries indicate that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not speculative in nature. However, the absence of the full assessment limits scrutiny of the findings and constrains the determination of their significance in the decision-making process.

Evidence suggests that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Nonetheless, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The non-disclosure of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means that the application does not present a complete 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. Development should facilitate positive health outcomes and avoid harm. However, the evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications are significant, as the competent authority cannot conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of 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 leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information for proper consideration.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts of the proposal is inadequate and does not capture the extent of change or the sensitivity of the local environment. The coastline of West Lewis is marked by its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence, significantly altering the character of the area and leading to a permanent change in the landscape.

The application fails to convey the true scale of the visual changes that would occur.

The turbines, due to their size and proximity, would dominate the views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and detract from the area's naturalness and sense of remoteness. The assessment does not sufficiently highlight the significance of this impact in such a sensitive landscape.

Methodological issues also arise from the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially regarding important cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, challenging the reliability of the assessment.

Another critical shortcoming is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that visually and spatially connects to the Atlantic horizon. The assessment fails to consider these sites as interconnected assets, which leads to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and their relationship to the natural horizon. This change represents not just a visual impact but a broader cultural and spatial harm that has not been thoroughly addressed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural places and historic assets. The proposed changes are inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case scenario analysis weakens any assertions of compliance with policy.

Moreover, the identified impacts cannot be mitigated effectively. Given the turbines' scale, height, and proximity, their presence would be overwhelming and unavoidable. The resultant changes are 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 scale of impact, the sensitivity of the environment, or the interconnectedness of the landscape and heritage. These shortcomings hinder a dependable evaluation and strongly suggest that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment surrounding construction and pollution risks remains insufficient, lacking the necessary detail to accurately gauge potential environmental effects. This proposal entails significant seabed preparation and installation activities within a high-energy Atlantic setting. However, it fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on

mitigation and contingency measures to be developed after consent, which inhibits any meaningful assessment of their effectiveness or adequacy.

Particularly alarming is the reliance on undefined future measures, given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to contamination and sediment disturbance. While the application notes risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not provide adequate detail on preventative, controlling, or monitoring measures.

Moreover, there exists a level of uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential repercussions on marine species and habitats 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 obstructs the evaluation of whether suitable safeguards are established to manage pollution incidents. This introduces procedural risks and weakens the capacity of the competent authority to evaluate environmental protection measures prior to the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards stands in conflict with the requirements set by the Environmental Impact Assessment regime. Significant effects and corresponding mitigations must be appraised before consent is granted, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy stipulations concerning environmental protection and water quality.

When considering the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts, it becomes clear that the assessment is materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and collectively support the view that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

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

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

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

TOURISM

The assessment of tourism impacts presented in the application is significantly lacking, failing to analyse the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Despite the application acknowledging that 86% of visitors are attracted by the scenery, it does not provide a quantitative evaluation of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contribution.

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

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

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in meeting the requirements for sustainable development. It fails to address statutory duties, national policy, and evidential standards. Similar issues that led to the rejection of the Lewis Wind Power proposal in 2008 have resurfaced, where the unacceptable scale of industrialisation was previously highlighted. This proposal, despite being presented under a stronger policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing, does not provide a reliable evidential basis for determination.

There are significant gaps in baseline data, a reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, limiting a

comprehensive understanding of the likely significant effects and residual impacts.

Procedural deficiencies are also apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a material omission. These shortcomings inhibit the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts with the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural areas, or cultural heritage. Health and wellbeing impacts have not been shown to be acceptable, and there is no 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 adequately assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and internally inconsistent. The evidential standard required to confirm that adverse effects do not exist beyond reasonable scientific doubt has not been met. This engages the precautionary principle and prevents a lawful conclusion that impacts can be deemed acceptable.

Moreover, the proposal would lead to considerable and irreversible changes to a sensitive landscape. Industrialization along the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and impacts on tourism will result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The volume of missing information, policy conflicts, and unresolved environmental risks impede a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or utilize the relevant regulatory provisions to require the submission of the outstanding information.

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

Additional Comments

This development will affect the tourism industry.

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: 7ADB4439

Member of the public 1792

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 relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the development raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantial policy conflicts are evident. The proposal appears to conflict 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 satisfactorily 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 weaken the competent authority's ability to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant issues 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 must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to reliably account for the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This ambiguity compromises the integrity of the assessment, resulting in impacts that may not accurately represent the final development. Consequently, this situation prevents both the public and the competent authority from gaining a true understanding of the environmental consequences.

Furthermore, the application is heavily dependent 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 at a later stage inhibits any meaningful evaluation of these measures' effectiveness or the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally unacceptable and undermines the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and necessary mitigation must be established clearly before determination.

There are significant evidential shortcomings, including gaps in baseline data and limitations in methodology, which rely on assumptions rather than site-specific evidence. This generates uncertainty surrounding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold set by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be confirmed that impacts have been fully assessed or that appropriate safeguards are established.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a severely deficient assessment of marine ecology and protected species, failing to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence,

behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant evidence gaps and internal contradictions that cast doubt on its conclusions. It is situated in an area of the west coast of the Isle of Lewis that is critical for internationally important seabird populations, many of which are already experiencing declines. The application does not adequately demonstrate that these species will not be adversely affected, despite their presence in key foraging areas and migratory routes. There is a lack of robust evaluation regarding displacement, collision risk, or habitat loss associated with the development.

Notably, a contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment fails to substantiate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling creates uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion that would support the granting of consent. Additionally, these deficiencies demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In conclusion, the assessment's reliability is undermined by internal inconsistencies, methodological inadequacies, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements needed for a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity presented in this application is fundamentally inadequate. It adopts a reductive view, treating heritage merely as isolated and static features, neglecting their ongoing social, cultural, and spiritual functions within the community.

Significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are classified

as static elements, despite being active places of burial and spiritual practice. This categorisation fails to account for their continued use and meaning, as well as the impact that development would have on their surroundings. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their vital role in community life.

Moreover, the assessment entirely overlooks the intangible aspects of cultural heritage, including the Gaelic language and the traditions that shape the identity of the area. These critical elements are absent from the evaluation, representing a significant omission that hinders a proper understanding of the cultural impact of the proposed development.

There are also serious concerns about community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as an Indigenous People, has not been provided with a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to uphold established principles of participation concerning cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this essential evaluation, the competent authority cannot fulfil its legal obligations to assess the social, cultural, and economic impacts on the island community, making the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices represent a clear departure from necessary policy requirements.

Ultimately, the combination of these failures results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application lacks a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment has not been fully published, resulting in a significant evidential gap. This lack of transparency limits both public understanding and the competent authority's ability to evaluate social risks identified in the developer's own research. While available summaries indicate that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, the absence of the complete assessment hinders proper scrutiny of these findings and restricts the decision-making process regarding their significance.

Moreover, the perception of the proposal as a threat to community identity and cohesion has been noted, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or assigned the necessary weight. The non-disclosure of the full Social Impact Assessment therefore obscures the actual human and social costs of the development.

This opacity also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning are at stake. Without the complete dataset, the application lacks a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the evidence available points to adverse effects that remain undisclosed. Consequently, the absence of the full assessment precludes any demonstration of compliance with this policy.

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

In summary, the failure to disclose the full Social Impact Assessment, coupled with the documented existing adverse impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and substantiates the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application fails to properly assess the impacts on seascape, landscape, and visual aspects, leading to significant deficiencies in understanding the extent of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. Large-scale turbines close to the shoreline would introduce a dominant industrial presence that would fundamentally change this character, resulting in a permanent and irreversible transformation of the landscape.

The visual changes that would arise from the installation of these turbines are not adequately represented in the application. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not sufficiently capture the significance of this impact within such a sensitive landscape.

Concerns also exist regarding the methods used to select and present visual viewpoints. Evidence indicates that the viewpoints may not encompass the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. As a result, the magnitude of the visual impact may be understated, which casts doubt on the reliability of the assessment.

Moreover, the application neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape linked visually and spatially to the Atlantic horizon. Treating these assets in isolation disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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 broader cultural and spatial harm that has not been adequately considered in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change proposed is not in alignment with the requirement to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resultant change is fundamental and permanent, with no possibility of reduction to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The 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 detail needed to evaluate potential environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that will be developed after consent is granted, hindering any meaningful assessment of their adequacy.

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

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination cannot be reached. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, detailed management plans, and the uncertainty about potential impacts render the assessment deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. Unfortunately, the application does not adequately demonstrate how these essential uses and habitats will be safeguarded against significant disruption. The assessment of fisheries and marine life is lacking, failing to provide a thorough evaluation of the ecological or socio-economic impacts.

One major concern is the assumption that fishing activities can be displaced without any repercussions. The application does not present evidence that there are alternative fishing grounds that are accessible or capable of bearing the additional pressure. This critical omission raises serious questions, as such displacement could lead to overfishing in other areas, which may have broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based examination, the potential impacts on fisheries and local livelihoods remain obscured.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is likely to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application downplays the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency in the application regarding the need for licences to permit harm to European Protected Species, which is acknowledged, while simultaneously classifying 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 occur at levels that warrant legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal represents sustainable development.

The deficiencies in the assessment, particularly concerning fishing displacement, underestimation of acoustic impacts, and internal inconsistencies, render it incomplete and unreliable. These shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally incomplete, failing to recognise the interconnected nature of the offshore turbines and the onshore works. These components are assessed independently, leading to a fragmented evaluation that conceals the true extent of environmental and socio-economic consequences.

The onshore project includes the construction of a substation near Stornoway, cabling across protected moorland, and additional access infrastructure through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts means that the overall environmental footprint of the project remains unclear.

By neglecting the assessment of onshore impacts, the application hinders the proper

evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated together; however, the distinction between offshore and onshore elements prevents a full understanding of the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application falls short in addressing this issue and fails to establish that the overall carbon balance remains favourable.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible across long distances, creating an intrusive “wall of light” effect that will fundamentally change the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the local identity and the emerging astro-tourism sector. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to this oversight.

Equally concerning is the complete absence of an evaluation regarding the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, thereby failing to examine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment only exacerbates the issue, as it does not account for nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data constitutes a serious gap in understanding the potential ecological impacts.

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

From a policy standpoint, these omissions directly conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also weaken the overall assessment of landscape and seascape impacts, as night-time character is an integral part of the environment.

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

TOURISM

The evaluation of tourism impacts within the application is significantly lacking and does not address the economic and social implications for a vital sector of the Isle of Lewis economy. Tourism heavily relies on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application recognises that 86% of visitors are attracted by scenery, it neglects to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contributions made by tourism.

Since 2017, tourism on the island has seen remarkable growth, rising from £65 million to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the local economy. However, the application does not examine how the potential industrialisation of the seascape and deterioration of environmental quality may impact Tourism Gross Value Added or the broader economic resilience of the area. Without this critical assessment, it remains unclear whether the development would yield a net economic benefit or threaten an established and expanding sector.

Furthermore, the analysis omits consideration of the importance of environmental quality in bolstering tourism. Unspoiled landscapes and dark skies are essential to enhancing visitor experiences and fostering new markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates these shortcomings, resulting in a considerable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community characterised by limited economic diversification, the oversight regarding tourism impacts poses broader risks for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been appraised, which is required under the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and the disregard for the island's economic dependence contribute to a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was noted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential basis for proper determination.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, unspecified mitigation measures, and crucial omissions regarding impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

Procedurally, there are notable failures as well. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment

is a substantial omission. These issues prevent the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, fails to validate acceptable health and wellbeing impacts, and lacks evidence for a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately conducted, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are considerable and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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

Additional Comments

This proposal would devastate the Isle of Lewis in so many ways. Not only affecting the wildlife, marine mammals, disturb the peatlands, dark skies, affect tourism which then directly affects local jobs, but also mental health of islanders who have to put up with the works, then the infrastructure itself which may cause physical and mental harm and all for corporate greed - please reject this proposal - it never had proper consultation and is contrary to so many policies. People will just leave the island

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: DBF8F293

Member of the public 1793

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of the project question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present a sufficient evidential basis for a lawful decision. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The employment of a flexible design framework hinders a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures prevents an assessment of their efficacy. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There exist pronounced and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

Moreover, the proposal's scale is unprecedented for this area, with large turbines located in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot substantiate a lawful determination. In light of these issues, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal has significant shortcomings in its assessment of cultural heritage and community identity. It overlooks the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. Instead, the application takes a narrow view, treating heritage as a collection of separate and static assets. This approach fails to recognise the ongoing social, cultural, and spiritual roles these assets play in the community.

One major issue is the evaluation of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual significance, yet they are classified as static features in the assessment. This mischaracterisation ignores their current use and the impact of proposed development on their surroundings, leading to an incomplete understanding of cultural effects and neglecting their importance in community life.

Additionally, the application does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it acknowledge the long-standing relationship between the community and its coastal environment. These factors are crucial to the area's identity but are completely absent from the assessment, which is a notable oversight. Without this context, the cultural implications of the development cannot be comprehensively evaluated.

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

A significant procedural shortfall is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to consider the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

These issues also conflict with policy requirements, particularly those outlined in the National Planning Framework 4, which emphasises the protection of historic assets and places. The failure to account for both tangible and intangible heritage and to acknowledge living cultural practices marks a clear deviation from policy standards.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately addressed, and the application lacks a solid foundation for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in the assessment of seascape, landscape, and visual impacts, which do not adequately capture the scale of change or the sensitivity of the receiving environment. The character of the West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would result in a dominant industrial presence, fundamentally transforming this character and leading to a permanent alteration of the landscape.

Furthermore, the application fails to accurately convey the magnitude of the anticipated visual change. The scale and proximity of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of this impact within such a sensitive landscape.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints considered may not adequately represent the most sensitive receptors or the most severe scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the extent of visual impact has been downplayed, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context connected by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a more profound cultural and spatial detriment that remains inadequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The extent of the proposed changes is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a rigorous worst-case scenario assessment further erodes any assertion of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and inescapable. The resultant change is therefore fundamental and permanent, rather than something that could be rendered acceptable through mitigation measures.

In conclusion, the assessment inadequately reflects the magnitude of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings preclude a reliable evaluation and underscore the position that the proposal is at odds with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a materially incomplete assessment of onshore infrastructure, failing to fully account for the impacts of what constitutes a single integrated project. The offshore turbines are linked with the onshore works, yet these components are evaluated separately, leading to a fragmented approach that obscures the actual extent of environmental and socio-economic effects.

Specifically, the onshore works involve cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure through sensitive landscapes. This construction entails excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. Without a comprehensive assessment of these impacts, the application does not provide a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not adequately understood.

Concerns also arise regarding the potential risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protections. The application does not demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, thus revealing a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises serious questions about carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is no evidence provided that necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project as a cohesive whole and to

demonstrate the protection of peatlands, habitats, and land use interests is in direct conflict with the National Marine Plan and National Planning Framework 4. The lack of evidence that impacts can be avoided or mitigated further undermines the application's credibility.

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

TOURISM

The proposed development brings serious concerns regarding its impacts on tourism, a vital component of the Isle of Lewis economy. With tourism being fundamentally reliant on the area's wild coastline, near-pristine landscape, dark skies, and the overall sense of remoteness, any industrialisation of the seascape may jeopardise this crucial sector. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the economic contribution of tourism.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application lacks a model that considers how potential degradation of environmental quality may impact Tourism Gross Value Added and the broader economic resilience of the community. Without this essential analysis, it remains unclear if the development would create a net economic benefit or threaten an established and flourishing sector.

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, such as the need for unspoiled landscapes and dark skies, which enhance the visitor experience and cater to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this issue, leaving a substantial void in understanding how the proposal could affect this recognised and growing segment of the local economy.

In a context where economic diversification is limited for this island community, the lack of a thorough assessment of tourism impacts raises significant concerns regarding employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, contrary to the requirements of 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 obligation to prove net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to

evaluate the economic implications of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and recognising the island's economic dependencies result in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application echoes the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this application under a stronger policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community welfare, does not mitigate these concerns.

The evidential basis for the application remains incomplete and unreliable. There are crucial gaps in the baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures raises significant concerns. Key impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism impacts. Consequently, the Environmental Impact Assessment lacks completeness, hindering a thorough understanding of likely significant effects and residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory obligation under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment represents a significant omission, limiting the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, thus rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty around environmental risks, which may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion

regarding the acceptability of impacts.

Additionally, the proposal would lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and detrimental impacts on tourism are permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

As a visitor to Lewis, I write not as an outsider looking in, but as someone for whom these islands represent something increasingly rare and irreplaceable - a living wilderness at the edge of Europe, where the land, the sea, the sky and culture remain genuinely intact.

The Gaelic communities in the west coast of Lewis are not a backdrop to the landscape, they are part of it - as fragile and as precious. While most acknowledge the need for a transition to renewable energy, it should not come at any cost - and should definitely not place ease of access and private profitability above both community consent and preservation of a fragile, unique and special wilderness. A planning process that fails to fully reckon with what is at stake here is not just procedurally deficient, but a failure of imagination and of stewardship.

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: 275CF833

Member of the public 1794

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 marine licensing and Environmental Impact Assessment regimes. The concerns raised are founded upon a careful review of the Environmental Impact Assessment Report and its supporting documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is situated off the west side of the Isle of Lewis, a region characterised by its stunning Atlantic coastline, near-pristine surroundings, and rich cultural heritage. The dimensions, proximity, and design of this proposal give rise to significant doubts about its alignment with statutory requirements, national policy, and sustainable development principles.

The application notably lacks a sufficient evidential foundation for a lawful decision. There is a concerning absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Additionally, numerous key elements of the proposal remain undefined. The use of a flexible design framework results in an unclear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their potential effectiveness. Consequently, the documentation fails to furnish a comprehensive and informed view of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are evident and substantial conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and the wellbeing of the community. It does not establish that the national obligations to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly impact the statutory tests essential for granting consent and weaken the authority's capacity to deem the development acceptable from a policy perspective.

Furthermore, the scale of the proposal is unprecedented for this particular location, with large turbines proposed in close proximity to the shoreline. This raises significant worries regarding the landscape’s capacity, visual dominance, and potential environmental repercussions. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy suggest that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report suffers from significant deficiencies, leading to an incomplete and unreliable understanding of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity hinders the application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and competent authorities from fully grasping the true extent of the environmental impacts.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be mitigated later obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally inappropriate and conflicts with the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies be clearly identified before determination.

The report also exhibits severe evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn 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 fails to meet statutory requirements.

Consequently, the application does not fulfil the evidential criteria set out in the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not align with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been demonstrated that impacts have been adequately assessed or that suitable safeguards are established.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is critically flawed and fails to provide a comprehensive or reliable understanding of the ecological

receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not adequately identify species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been thoroughly assessed. This oversight compromises any assertions regarding the absence of significant effects on this species.

Further issues arise in the evaluation of basking sharks, where reliance on aerial surveys introduces considerable detection bias, especially in Atlantic conditions. This approach is prone to underestimating the presence of these sharks, particularly when compared to established land-based observations that demonstrate frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and undermines the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than on robust evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty created by these deficiencies inhibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, the grant of consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant gaps and inconsistencies that undermine its conclusions. The application does not sufficiently demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed

development. This area is crucial for foraging and migratory routes, yet the assessment fails to adequately evaluate risks associated with displacement, collision, or habitat loss.

Moreover, the application contains a fundamental contradiction. The developer claims that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not backed by adequate evidence.

The assessment lacks enough proof that seabirds associated with protected areas, such as the Lewis Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is not fully addressed, and the reliance on modelling methods adds uncertainty, especially for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly when baseline data is missing and behavioural responses are not well understood.

Furthermore, placing turbines within a recognised migratory corridor poses a significant risk by obstructing a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not properly assess the long-term impacts of sustained mortality in this corridor or the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and modelling limitations, means the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion that would support consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts an overly simplistic viewpoint, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social,

cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spiritual sites, yet they are mischaracterised in the assessment as static features, disregarding their continued use, significance, and the implications of development on their surroundings. This inadequate portrayal leads to an incomplete understanding of cultural effects and overlooks the vital role these sites play in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are essential to the area's identity but are entirely omitted from the evaluation, creating a critical gap in understanding the cultural impact of the proposed development.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement calls into question the legitimacy of the assessment and contravenes established principles for participation in matters affecting cultural and environmental interests.

A major procedural failure is the absence of a compliant Island Communities Impact Assessment, which is legally mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these significant deficiencies position the proposal in direct conflict with the National Planning Framework 4, especially concerning the protection of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, clearly diverges from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not offer a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and significantly undermines the evaluation of social impacts, health, and wellbeing associated with this development. Although the developer conducted focus groups with local residents, the full report has not been made available. This gap in

evidence hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own work.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline poses an immediate risk of creating a continuous industrial presence that would fundamentally alter this character. This transformation of the

landscape would be permanent and irreversible.

The application fails to adequately represent the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would erode the essential qualities of naturalness and remoteness and significantly impact visual amenity. The assessment does not convey the true level of this impact or its significance within such a sensitive landscape.

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

Additionally, the application overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these as isolated assets neglects their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This impact transcends visual implications, introducing broader cultural and spatial harm that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment weakens 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 change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

Collectively, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks adequate detail regarding construction and pollution risks, rendering the assessment materially deficient. It proposes substantial seabed

preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures post-consent, which obstructs a meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline supports clean coastal waters and crucial 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 sufficient detail on how these risks will be prevented, controlled, or monitored.

Uncertainties also exist regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies means that it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats identified as sensitive within the wider assessment.

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

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainties regarding potential impacts hinder a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast not only support a diverse marine ecosystem but also house an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be maintained without considerable disruption.

A significant concern is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are accessible, available, or able to bear additional pressure. This oversight is critical, as displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and the livelihoods of those dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is likely to cause disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns. Nevertheless, the application minimizes the significance of these effects, lacking adequate supporting evidence.

There is an evident contradiction in the application concerning the necessity for licences to authorise harm to European Protected Species, while concurrently describing such impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where harm is expected to a level that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with the project, including cabling across protected moorland and the construction of a substation near Stornoway, introduce significant risks to sensitive habitats. The proposed access infrastructure runs through landscapes that are ecologically fragile, particularly involving excavation across deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and sensitive

habitat. The application fails to provide a comprehensive assessment of these impacts, which hinders a full understanding of the project's environmental footprint.

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

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

The disturbance of peatland associated with these works raises serious concerns about carbon balance. The release of stored carbon could lead to a carbon debt that undermines the very objectives of renewable energy development. Yet the application does not sufficiently address this issue or demonstrate that the overall carbon balance remains positive.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include any assessment of dark skies and nocturnal wildlife, which constitutes a material omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, an important aspect of environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon, thereby fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting will affect visual amenity,

landscape character, and the experiences of both residents and visitors. This oversight is significant considering the value of dark skies to the area's identity, particularly as emerging sectors like astro-tourism gain importance. The absence of such assessments represents a clear gap in the overall landscape and environmental evaluation.

Moreover, there is no examination of potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The lack of a lighting impact assessment or phototaxis study prevents an understanding of how aviation lighting might affect these species or lead to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, for instance, may forage or migrate at night and are vulnerable to disorientation from artificial lighting; yet, this risk has not been addressed. The absence of site-specific night-time data results in a critical shortfall in understanding the ecological impacts involved.

Without an assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The requisite evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and preventing a lawful determination.

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

In conclusion, 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 incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts related to the proposed development is significantly lacking and does not adequately evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would impact visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, 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 how the industrialisation of the seascape and the potential loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise a crucial and expanding sector.

Moreover, the assessment fails to acknowledge the significance of environmental quality in underpinning tourism, including the critical role that unspoiled landscapes and dark skies play in shaping visitor experiences and the growth of niche markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

Given that the island community has limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the economic dependence of the island culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and underscores 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 when evaluated against statutory duties and national policy. It shares significant issues with the 2008 Lewis Wind Power proposal, which was rejected due to unacceptable industrialisation. Now, it is put forward under a more robust policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis. There are serious gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment is

incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are clear procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal contradicts National Planning Framework 4. It does not demonstrate protection of biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring 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 inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

The proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, 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 significant information deficiencies, alongside policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require submission of the missing information.

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

Additional Comments

This would be a disaster on some many levels for the islands it’s a flat no from the local population and that no needs to be listened to.

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: 87C093AE

Member of the public 1795

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation has revealed significant planning, environmental, cultural, and procedural deficiencies.

The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. However, the scale and design of the proposed development pose serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Moreover, the application lacks an adequate evidential basis necessary for lawful determination. Missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal contribute to a significant lack of clarity. The use of a flexible design framework complicates understanding of potential significant effects, while unestablished mitigation measures leave their efficacy unassessed. Consequently, this documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects unsupported by robust evidence.

Furthermore, there are evident policy conflicts present within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

Given the unprecedented scale of this proposal and the placement of large turbines close to the shoreline, significant concerns arise related to landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and does not provide a clear or accurate account of the likely environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, compromising the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent based on the premise that environmental harm will be managed later obstructs a meaningful evaluation of effectiveness and the assessment of residual impacts. Deferring crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination is made.

In addition, there are substantial evidential gaps, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects lack robust supporting data. The failure to provide adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it has not been established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, 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 impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development lacks a thorough assessment of alternatives, failing to comply with the requirements of the Environmental Impact Assessment regime. Instead of a structured evaluation of realistic options based on their environmental impacts, the application presents a narrative about the evolution of the project. This approach does not adequately show that less harmful alternatives have been identified, assessed, and preferred over more damaging solutions.

Furthermore, there is no clear, evidence-based comparison of alternative locations, scales of development, or design configurations. The application does not illustrate that the developer has genuinely considered placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis obstructs the conclusion that the proposed location is the least damaging.

These inadequacies extend to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation through design has not been applied, resulting in reliance on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally inadequate, failing to deliver a thorough and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically rich marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species, leading to an assessment that does not offer a credible evidential basis for evaluating potential impacts.

Particularly concerning is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal areas for both foraging and movement. Consequently, this oversight results in a lack of analysis concerning their core foraging range and behavioural patterns. The potential impacts from construction disturbance, noise, and increased activity have therefore not been thoroughly evaluated, undermining any assertions made about the absence of significant effects on this

species.

Additionally, the assessment of basking sharks presents further shortcomings, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such data culminates in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

Given these methodological shortcomings, conclusions stating negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or assess protected species. The degree of uncertainty generated precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, the lawful granting of consent is not achievable.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in the ornithological assessment, marked by notable evidence gaps and internal inconsistencies that compromise its conclusions. Located within key foraging areas and migratory pathways, the development on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline, fails to convincingly demonstrate that these species will not face adverse effects. The assessment inadequately evaluates the risks of displacement, collision, and habitat loss, which are critical factors for these vulnerable populations.

A glaring contradiction exists within the application; while the developer asserts that there are no significant adverse effects, it concurrently puts forth a Habitats Regulations derogation case, which should only arise when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn lack sufficient backing from the available evidence. Furthermore, the assessment does not adequately substantiate

that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected, failing to consider the significance of these feeding grounds fully.

The methodologies employed are likely to underestimate potential mortality rates, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. This introduces uncertainty given that the baseline data is often incomplete and the behavioural responses of these birds are not fully understood. Additionally, the siting of turbines within a recognised migratory corridor poses a considerable risk, effectively creating an obstruction in a primary flight path for species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impact on species with small global populations.

Regulatory requirements have not been met, as the application fails to provide the necessary evidence to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations means that the evidential standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which hampers any lawful conclusion that might support consent.

Moreover, the identified deficiencies represent a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted directly conflicts with national policy. Altogether, the assessment's unreliability, stemming from methodological weaknesses and insufficient evidence, undermines any robust evaluation of potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, particularly regarding the West Lewis coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. This application adopts a simplistic view, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the handling of significant cultural sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they serve as active places of burial and spiritual practice. The assessment's failure to account for their continued use and meaning, along with the potential impact of development on their setting, leads to an incomplete understanding of cultural effects and ignores their essential role in community life.

Furthermore, the evaluation neglects intangible aspects of cultural heritage such as the Gaelic language, traditions, and the enduring connection between the community and

the coastal environment. These components are vital to the area's identity yet are entirely overlooked in the assessment, representing a significant gap. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Community rights and engagement also raise serious concerns. The Gaelic-speaking population has a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A further procedural flaw is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. This omission means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. Such a gap alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with living cultural practices, clearly deviates from policy requirements.

Overall, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The inadequacy in assessing social impacts, health, and wellbeing is evident and poses immediate risks that necessitate urgent action. While the developer initiated a Social Impact Assessment that included local residents' focus groups, the complete report remains unpublished. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted in the developer’s findings.

Summaries available suggest that residents are currently facing notable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These experiences result from direct interactions with the community and are therefore factual, not speculative. However, the absence of the complete assessment limits thorough scrutiny of these findings and their implications for decision-making.

Moreover, there is a clear perception among residents that the proposal poses a direct threat to community identity and cohesion, with the developer identifying "cultural loss" in its findings. These impacts have not been adequately integrated into the main

application nor given the necessary consideration. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency severely undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality are at risk. Without access to the complete dataset, the application falls short of providing a thorough evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm. Yet, the existing evidence indicates adverse effects that have not been fully revealed. Consequently, without the full assessment, compliance with this policy remains unproven.

The procedural consequences are profound. The competent authority is unable to carry out a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment, marking a significant omission within the application and failing to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous and dominant industrial presence, fundamentally changing this unique character and leading to a permanent and irreversible transformation of the landscape.

The assessment accompanying the application inadequately captures the extent of visual change anticipated. Given the scale and proximity of the turbines, they are expected to overshadow views from residential areas, historic sites, and popular coastal locations. Such an impact would erode the essential qualities of naturalness and remoteness, yet the assessment fails to convey this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, thus compromising the reliability of

the assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and severing their relationship with the natural horizon. This goes beyond visual impact and encompasses a broader cultural and spatial harm that has not been adequately evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The magnitude of change is inconsistent with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a thorough worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is insufficient and lacks the necessary detail to assess potential environmental impacts adequately. The proposal entails considerable seabed preparation and installation activities in a high-energy Atlantic environment, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be established after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness.

This dependence on unspecified future measures is particularly alarming considering the sensitivity of the affected environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disruption and pollution. Although the application recognises hazards such as sediment mobilisation

and accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, managed, or monitored.

Furthermore, there remains uncertainty regarding the extent 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 scope, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application hampers the evaluation of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of vital environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. The application also fails to demonstrate adherence to policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be reviewed collectively; however, the separation of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect visible over long distances across the western horizon. This change fundamentally alters the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies. The absence of an assessment of dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant oversight, as these dark skies are crucial for the area's environmental quality, cultural identity, and tourism value, particularly for emerging sectors such as astro-tourism.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This gap in

the assessment is critical considering the importance of dark skies to the area's identity. Additionally, there is no consideration of how the proposed lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and their mortality rates are not addressed.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it fails to capture nocturnal activity and associated risks. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, the omission contravenes the National Planning Framework 4, which emphasises the protection of natural places and environmental quality. This oversight undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the surrounding area.

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 renders the application incomplete and inadequate to support a lawful determination.

TOURISM

The proposal under consideration overlooks the essential economic and social impacts on a vital sector of the Isle of Lewis economy, specifically tourism. This sector relies heavily on the area's wild coastline, nearly unblemished landscape, dark skies, and its inherent sense of remoteness. Although the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the island has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs, contributing up to 16% to the local economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and the accompanying decline in environmental quality on Tourism Gross Value Added or the broader economic resilience of the area.

Without this critical analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in underpinning tourism, including the necessity of unspoiled landscapes and dark skies for an enriching visitor experience. The exclusion of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable void in understanding the impacts on a recognised and expanding part of the local economy. This is particularly pertinent for an island community characterised by limited economic diversification, where the lack of impact assessment on tourism extends to broader implications for employment, local enterprises, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to substantiate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate a net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failures to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminate in a significant evidential gap. This gap hinders a thorough assessment of the economic effects and reinforces the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm exemplifies a significant shortcoming in meeting the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current proposal is set against a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short of these essential requirements.

There are substantial deficiencies in the evidential basis provided for the determination of this application. Critical gaps exist in baseline data, and the use of an undefined design envelope raises concerns about reliability. Additionally, the proposed mitigation measures lack specification, and significant impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and residual impacts.

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

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

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering any lawful conclusion that the impacts are acceptable.

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

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

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

Additional Comments

Our island is a place of beauty which attracts many people to visit the island. Tourism is what makes our island flourish in the summer.

These monstrosities will be an eye sore. The damage will be catastrophic to the environment and our tourist industry. These are the basic ones. The last is endless.

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: 54D558A3

Member of the public 1796

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application. The application has been submitted under the marine licensing and Environmental Impact Assessment frameworks. It is located off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. Upon reviewing the Environmental Impact Assessment Report and accompanying documents, several planning, environmental, cultural, and procedural issues have been identified.

The application lacks an adequate evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a proper understanding of its impacts. The use of a flexible design framework creates ambiguity about significant effects, while the unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

Furthermore, there are significant policy conflicts. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national standards for protecting biodiversity, climate interests, and environmental integrity. These discrepancies undermine the statutory tests required for consent and affect the competent authority's ability to deem the development acceptable in policy terms.

The scale of the proposal is unprecedented for this area, with large turbines situated near the shoreline, raising serious 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 light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly regarding the assessment of alternatives. It lacks a structured and reasoned comparison of realistic alternatives based on their environmental effects, instead providing a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Furthermore, the absence of a transparent, evidence-based comparison of alternative offshore locations, development scales, and design configurations raises serious concerns. Notably, the application does not show that the developer has seriously

considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The West Lewis coastline's sensitivity and the critical role of proximity to shore in assessing impact make this lack of analysis particularly detrimental. Consequently, it is impossible to determine that the proposed siting is indeed the least damaging option available.

The shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than applying mitigation by design.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This is a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more appropriate and less harmful alternatives exist. Without a comprehensive alternatives assessment, it cannot be claimed that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially in the context of safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that further substantiates the conclusion that the application has not been adequately evaluated, thus failing to 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 lacks a comprehensive understanding of ecological receptors. This marine system is biologically active and highly sensitive, yet the data collected is incomplete. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of species, leading to an assessment that cannot reliably inform evaluations of potential impacts.

One notable shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active foraging and movement patterns along the coast. By not considering their core foraging range, the assessment fails to evaluate the potential impacts of construction disturbance, noise, and increased activity on these animals. This oversight undermines any conclusions drawn regarding significant effects on otters.

Additionally, there are serious deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions, which is likely to lead to an underestimation of their presence. This is further highlighted by established land-based observations that indicate these sharks

frequently utilise these waters. The omission of such crucial data results in an incomplete baseline, which in turn weakens the conclusions drawn.

The methodological weaknesses indicate that any conclusions suggesting negligible or non-significant effects are based on unfounded assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits the meaningful assessment of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions. This introduces uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and the stipulations set out in National Planning Framework 4, as it fails to properly identify or assess protected species. This uncertainty hinders the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, it is not lawful to grant consent under these circumstances.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These significant deficiencies prevent a thorough evaluation of impacts on marine ecology and protected species, ultimately suggesting that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the necessary evidential support to demonstrate that it will not adversely affect the internationally important seabird populations found along the west coast of the Isle of Lewis. This region is home to many seabird species that are already in decline, and the application fails to adequately address the implications of potential displacement, collision risk, or habitat loss within key foraging areas and migratory pathways.

There is a significant contradiction within the application itself, as it asserts that there will be no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case. Such a case is only applicable when significant harm is anticipated, thus raising concerns about the credibility of the assessment and the validity of its conclusions. The evidence presented does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. Moreover, the critical importance of these feeding grounds has not been thoroughly assessed, and the modelling approaches used introduce considerable uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional significant risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently

evaluate the long-term consequences of sustained mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to confirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and modelling deficiencies, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby precluding a lawful conclusion in favour of consent. Furthermore, the identified deficiencies are indicative of non-compliance with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to establish that internationally important seabird populations will remain unaffected directly conflicts with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal presented fails to adequately assess cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape that intricately links environment, language, tradition, and community. The assessment adopts an overly simplistic view, treating heritage as a collection of separate, static assets instead of recognising their continuing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are addressed. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use and meaning, as well as the potential impacts of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural implications and disregards the sites' importance in community life.

The intangible aspects of cultural heritage are also not considered, with the assessment omitting critical elements like the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These factors are vital to the area's identity, yet their exclusion signifies a major oversight. Without addressing these elements, the cultural impact of the development remains inadequately assessed.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of genuine engagement calls into question the credibility of the assessment and fails to

adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

Furthermore, a significant procedural error arises from the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without such an assessment, the relevant authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This oversight alone renders a lawful determination impossible.

From a policy standpoint, the deficiencies in the application are at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear breach of policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and essential statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, and the application does not provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal's social impacts on the community have not been adequately assessed. The developer produced a Social Impact Assessment, which included discussions with local residents, but the complete report has not been shared. This lack of transparency creates a significant gap in the evidence, preventing both the public and the responsible authorities from understanding the social risks revealed by the developer's research.

Residents are currently facing measurable stress, anxiety, and concern due to the project's size and its proximity to their homes. These effects stem from direct feedback and are not mere speculation. However, the withholding of the full assessment limits the opportunity for thorough examination of the results and restricts the capacity to assess their relevance in the decision-making process.

Furthermore, there is a perception that the proposal threatens community identity and cohesion, with the developer identifying "cultural loss" in their findings. Despite this recognition, these social impacts have not been properly included in the application nor have they been given adequate consideration. The failure to disclose the complete Social Impact Assessment conceals the true human and social consequences of the development.

This lack of transparency also weakens the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health ramifications is crucial for large developments, especially when they may affect the character and operation of the community. By not providing the complete set of data, the application

does not offer a comprehensive evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not align with the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and avoid negative impacts, yet the existing evidence suggests adverse effects that remain undisclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to perform a thorough evaluation of socio-economic and health impacts without the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy the evidential requirements necessary under the Environmental Impact Assessment guidelines.

Overall, the decision not to disclose the full Social Impact Assessment, combined with clear evidence of negative impacts already felt by the community, leads to an incomplete and unreliable evaluation. This situation hinders a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline boasts an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline threatens to establish a continuous and dominant industrial presence, fundamentally transforming this unique landscape. This change would be permanent and irreversible, detracting from the area's inherent qualities.

The visual impact assessment falls short in representing the magnitude of change that these turbines would impose. Their scale and location would dominate views from residential areas, historic sites, and popular coastal locations, negatively affecting visual amenity and compromising the naturalness and sense of remoteness that define the region. The assessment does not adequately convey the significance of these impacts, particularly given the sensitivity of the landscape.

Concerns also arise regarding the methodologies used to select and present visual viewpoints. Evidence indicates that the viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the risk that the visual impact has been understated, calling into question the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, disregarding their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contravenes National Planning Framework 4, which mandates the protection of natural places and historic assets. The scale of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further undermines any assertion of compliance with relevant policies.

The impacts identified in the application cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. This change is not merely a matter of degree; it is fundamental and permanent, incapable of being diminished to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is inadequate and lacks the necessary detail to assess the likely environmental impacts. The project entails significant seabed preparation and installation activities in a high-energy Atlantic setting, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on future mitigation and contingency measures that are to be developed post-consent, making it impossible to assess their sufficiency or effectiveness meaningfully.

This dependence on unspecified future actions is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disruption and contamination. While the application recognises risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on the prevention, control, or monitoring of these issues.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to potential effects on marine species and habitats that have

already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning to a later stage, the application hinders the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and undermines the capability of the competent authority to evaluate environmental protection measures at the time of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of specified mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts render the assessment fundamentally deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment 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 assessment of the onshore infrastructure is incomplete and fails to address the full extent of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are intrinsically linked; however, they are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure traversing sensitive landscapes. This construction includes excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not present a comprehensive assessment of these impacts, which hinders the understanding of the project's overall environmental footprint.

By not adequately assessing onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be considered collectively. Nonetheless, the separation of offshore and onshore components means the combined impacts on peatlands, habitats, and communities remain poorly understood.

Furthermore, there are significant risks posed to sensitive habitats, such as machair

systems and peatland environments, which benefit from policy protection. The application does not prove that these habitat impacts have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance, as the disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or to show that the overall carbon balance is advantageous.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of any assessment regarding nocturnal wildlife and dark skies represents a significant oversight in the Environmental Impact Assessment. The dark skies along the West Lewis coastline are crucial to the area's cultural identity, environmental quality, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, threatens to create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the consequences of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning as dark skies play a vital role in attracting emerging tourism sectors, such as astro-tourism. The omission of these critical impacts results in a substantial gap in the overall assessment of landscape and environmental factors.

Equally important is the lack of evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial light, which can disorient them and increase their risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, failing to address how aviation lighting could affect these species or contribute to increased mortality rates.

Additionally, reliance on daytime survey data in the ornithological assessment misses the nocturnal activities of species like Kittiwakes, which may forage or migrate at night and are equally at risk of disorientation from artificial lighting. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts involved.

Without a thorough assessment of the effects on nocturnal wildlife, it is impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions clash with the National Planning Framework 4, which seeks to protect natural places and environmental quality. This oversight undermines the overall evaluation of landscape and seascape impacts, as the character of night-time forms an essential aspect of the environment.

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

TOURISM

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

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the implications of the industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise an already thriving sector.

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

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary standards for sustainable development as dictated by statutory duties and national policy. This proposal mirrors the fundamental issues that led to the rejection of the Lewis Wind Power application in 2008, which was deemed unacceptable due to the excessive scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

It lacks a comprehensive and reliable evidential basis for assessment. Key gaps in baseline data and an undefined design envelope are significant concerns, compounded by the reliance on unspecified mitigation measures. Furthermore, crucial impact pathways—including nocturnal wildlife, full onshore infrastructure, and tourism effects—are notably absent from the assessment. This results in an Environmental Impact Assessment that is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings. The absence of a compliant Island Communities Impact Assessment violates statutory duties outlined in the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a significant omission. Such gaps inhibit the competent authority's ability to evaluate the potential effects on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

In addition, the proposal conflicts directly with the National Planning Framework 4, as it does not sufficiently safeguard biodiversity, natural landscapes, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are manageable and lacks

evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of the offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounding environmental risks remains significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents lawful determination of the proposal's acceptability.

Moreover, the application would lead to considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the erosion of dark skies, disruption of cultural and visual connections, and negative implications for tourism present permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, I formally request that consent for the Spiorad na Mara Offshore Wind Farm application is refused in its entirety.

Additional Comments

1. I am especially concerned about the health implications, particularly the noise and light, from of such structures.
2. Such an offshore project should not be so close to land.
3. I am concerned about the damage to the seabed, damage to sea life and damage to birds.
4. I fear for tourism ion the island. Millions of pounds have been spent on a deep water port so cruise ships can dock and passengers can be bussed through the island and spend their money. I doubt they will be interested in leaving the ships to be bussed around to see offshore wind farms so close to shore
5. The visual implications of such structures to tourism and to us islanders is fearful. Beautiful coastlines spoilt
6. We islanders are not even going to benefit from this N4 project yet we are expected to put up with it
7. On land the implications of this project will also be felt with the construction aspect.
8. I also fear the damage that the construction and pollution of such a project will cause

.

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: 14AF6D26

Member of the public 1797

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 frameworks. The objection is based on a review of the Environmental Impact Assessment Report and related documents, highlighting various deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information presented is limited and inconsistent. Moreover, key aspects of the proposal remain undefined. The flexible design framework used impedes a clear understanding of likely significant effects. Additionally, reliance on unspecified mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a full understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by robust evidence.

Substantial policy conflicts are evident. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests needed for consent and weaken the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns, especially with large turbines positioned close to the shoreline, which impacts landscape capacity, visual dominance, and environmental consequences. 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. Therefore, the precautionary principle must be applied in these circumstances.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the installation of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped nature. This change would create a continuous industrial presence that fundamentally transforms the area, leading to a permanent alteration of the landscape. The assessment of seascape, landscape, and visual impacts associated with this development is significantly lacking, failing to adequately reflect the magnitude of change and the sensitivity of the local environment.

The scale and proximity of the turbines would lead to their dominance in views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the naturalness and sense of remoteness that define the region. Furthermore, the assessment does not adequately communicate the significance of these impacts in a landscape that is already sensitive.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that some viewpoints do not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which calls into question the reliability of the assessment.

Another critical shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, tied together through visual and spatial relationships with the Atlantic horizon. The assessment wrongly treats these assets as isolated, leading to an incomplete understanding of the potential impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and affecting their connection to the natural environment. This presents not merely a visual concern but also a broader cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 by failing to protect natural places and historic assets. The scale of proposed changes does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case impact assessment further undermines any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would render their presence unavoidable and dominant. Consequently, the transformation of the landscape would be fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately convey the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage.

These deficiencies hinder a reliable evaluation and underscore the conclusion that the proposal is at odds with the necessary protection of this significant landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, yet the application does not adequately evaluate the ecological or socio-economic impacts of the proposal. A critical concern lies in the assumption that fishing activity can be displaced without consequences, with no evidence provided to support the availability or accessibility of alternative fishing grounds capable of sustaining additional pressure. This lack of information is significant, as it poses risks of overfishing elsewhere and could have wider economic repercussions for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries considerable risks for marine species, notably due to the underwater noise resulting from construction activities. The extended use of high-energy hammer piling is expected to cause disturbances over large distances, affecting species such as dolphins. The potential impact on a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

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

Additionally, the assessment neglects to account for cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to determine 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 avoid unacceptable impacts on marine biodiversity, thereby failing to establish that the proposal represents sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a critical evaluation of nocturnal wildlife and dark skies, representing a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the environmental quality, cultural identity, and tourism of the area. The introduction of permanent red aviation lighting, which would be visible from great distances, threatens to create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to assess how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the relevance of dark skies to the area's cultural identity and the development of astro-tourism. The neglect to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

Equally alarming is the absence of any analysis regarding the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be sensitive to artificial lighting, leading to disorientation and a heightened risk of collision. The application does not include a lighting impact assessment or a study on phototaxis, which means the potential adverse effects of aviation lighting on these species and their mortality rates are left unexamined.

The situation is further complicated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data leads to a critical inadequacy in understanding ecological impacts.

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

From a policy standpoint, this omission is at odds with National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

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

TOURISM

The assessment concerning tourism impacts is notably lacking and does not adequately examine the economic and social repercussions for a vital component of the Isle of Lewis's economy. The region's tourism relies heavily on its wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. The application recognises that 86% of visitors are attracted by the scenery, yet it does not provide any quantifiable analysis of how extensive offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Tourism has experienced remarkable growth, climbing from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, representing up to 16% of the island's economy. However, the application fails to model how the industrialisation of the seascape and the consequent degradation of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience. Without this analysis, it remains unclear if the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in bolstering tourism. This includes the vital role of unspoiled landscapes and dark skies in enhancing visitor experiences, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the oversight in assessing tourism impacts has broader ramifications for employment, local businesses, and the sustainability of the community. The failure to provide a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency results in a considerable evidential gap. This hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies in meeting the standards required for sustainable development as outlined by statutory duties, national policy, and evidential criteria. This application revisits the fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008,

highlighting an unacceptable scale of industrialisation. Notably, it is now presented within a regulatory framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

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

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

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

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

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

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

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

Additional Comments

My daughter lives in a beautiful part of the world, the Isle of Lewis, and your plans will ruin this forever. Shame on you all for your greed.

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: 5C47FB2F

Member of the public 1798

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 relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the development raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantial policy conflicts are evident. The proposal appears to conflict 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 satisfactorily 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 weaken the competent authority's ability to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant issues 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 must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. The flexible Project Design Envelope lacks commitment to specific dimensions, layouts, or configurations for turbines, introducing considerable uncertainty. This ambiguity hinders the assessment's integrity and means that the reported impacts may not accurately reflect the actual development, thereby limiting both public understanding and the competent authority's ability to gauge the full extent of environmental effects.

Consent is being sought based on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach implies that environmental harm will be addressed post-consent, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to later stages is procedurally unacceptable and undermines the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before any determination is made.

The application also suffers from considerable evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty regarding the magnitude and significance of the impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hampers the understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is at odds with statutory requirements.

As a result, the application does not satisfy the evidential threshold under the Habitats Regulations required 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, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that appropriate safeguards exist.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation strategies, and the presence of gaps in baseline data contribute to making the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

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

successfully capture vital information regarding the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a reliable evidential foundation for determining potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations will not be adversely affected, particularly in light of the west coast of the Isle of Lewis supporting many species already in decline. The assessment is materially flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It does not adequately evaluate the implications of displacement, collision risk, or habitat loss, particularly within key foraging areas and migratory

pathways.

A key contradiction exists, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The application neglects to provide sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, failing to fully account for the importance of these feeding grounds. Additionally, the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars, and is likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses are poorly understood.

The siting of turbines within a recognised migratory corridor adds a significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application 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, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. Moreover, the identified deficiencies indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning community identity and cultural heritage is fundamentally insufficient, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Instead, the application adopts a reductive viewpoint, viewing heritage merely as a collection of isolated, static assets without recognising their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of sites of cultural significance, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment misclassifies them as static features. This oversight neglects their continued significance, meaning, and the consequences of

development on their environment, resulting in an incomplete understanding of cultural impacts and disregarding their importance within community life.

Additionally, the application neglects intangible cultural heritage, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These components are vital to the area's identity but are not considered in the assessment, marking a significant oversight. The absence of these factors prevents a comprehensive understanding of the cultural impacts of the development.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population, which has a distinct cultural identity and is recognised as Indigenous People, has not been afforded the Free, Prior and Informed Consent process. This lack of meaningful engagement diminishes the legitimacy of the assessment and fails to align with established principles regarding participation in decisions that affect cultural and environmental interests.

A significant procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic implications for the island community, creating a barrier to lawful determination.

From a policy standpoint, these shortcomings position the proposal at odds with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, marks a clear deviation from policy requirements.

Collectively, these failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application lacking a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning, as it significantly hampers the ability of the public and relevant authorities to comprehend the social risks identified through the developer’s own investigations. Although the developer conducted focus groups with local residents, the failure to publish the full report creates a considerable evidential gap. This deficiency restricts proper scrutiny of the findings, thereby limiting the understanding of their importance in the decision-making process.

Residents have already reported experiencing notable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts stem from direct engagement with the community, making them grounded in reality rather than

speculation. Additionally, the proposal appears to threaten community identity and cohesion, with findings from the developer indicating the possibility of “cultural loss.” Unfortunately, these significant impacts have not been adequately addressed in the main application, resulting in a lack of appropriate consideration.

Furthermore, the withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development. Such omissions undermine the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is essential for projects of this nature, particularly when they could affect community character and functionality. Without the full dataset, the application presents an incomplete evidential basis to assess the balance between benefits and detriments.

From a policy standpoint, the application falls short in demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence available suggests existing adverse effects that remain undisclosed. Consequently, it cannot be established that the application complies with this essential policy in the absence of the complete assessment.

The procedural ramifications of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current negative impacts, leads to an incomplete and unreliable assessment. This ultimately obstructs a lawful determination, reinforcing the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of landscape, seascape, and visual impacts presented in the application is significantly inadequate, failing to capture the true scale of change and the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its open Atlantic horizon and an undeveloped quality, which together contribute to a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a pervasive industrial presence that would irreversibly transform this landscape, fundamentally altering its character.

Furthermore, the application does not sufficiently address the extent of visual change resulting from the turbines' scale and proximity. Their imposing nature would dominate the views from residential areas, historic sites, and popular coastal locations, detrimentally affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment inadequately captures the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant cultural heritage sites and valued landscapes. This leads to a potential underestimation of visual impacts, which in turn questions the reliability of the overall assessment.

Additionally, there is a critical oversight in evaluating the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape context, interlinked visually and spatially with the Atlantic horizon. The assessment incorrectly treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete understanding of the impacts on their settings and cultural importance.

The proposed industrialisation of the seascape would sever these crucial connections, altering how heritage assets are perceived and disrupting their ties to the natural horizon. This signifies not only a visual disturbance but also a deeper cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, this proposal directly contravenes the National Planning Framework 4 concerning the preservation of natural spaces and historical assets. The magnitude of change associated with the proposal is incompatible with the obligation to protect landscape character, visual amenity, and the settings of sites of cultural significance. The lack of a thorough worst-case scenario analysis further compromises any assertion of compliance with policy.

It is evident that the impacts identified in the assessment cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. The resulting alterations are fundamental and permanent, rather than manageable to an acceptable extent through mitigation strategies.

In conclusion, the assessment falls short of accurately portraying the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strongly indicate that the proposal is at odds with the essential protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment concerning construction and pollution risks lacks the necessary detail to adequately evaluate the likely environmental effects of the proposal. The project involves extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, especially given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient detail on the prevention, control, or monitoring of these risks.

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, determining the extent, duration, or ecological effects of these impacts is impossible. This uncertainty also extends to the potential effects on marine species and habitats 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 respond to pollution incidents. This approach introduces procedural risk and compromises the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; the absence of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment concerning dark skies and nocturnal wildlife represents a significant flaw in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that would be visible over extensive distances, creating a disruptive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the area's identity and the

growth of tourism sectors like astro-tourism. The absence of these assessments points to a clear deficiency in the overall landscape and environmental evaluation.

More alarmingly, there is no examination of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and an increased risk of collisions. The lack of a lighting impact assessment or phototaxis study means there is no analysis of how aviation lighting could affect these species or heighten mortality risks.

This gap is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal behaviours and associated dangers. Species such as Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a crucial shortcoming in understanding ecological consequences.

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

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape effects, as the character of night-time environments is a fundamental aspect of the overall ecology.

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

TOURISM

The proposed development fails to adequately assess the impacts on tourism, which is a crucial part 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 notes that 86% of visitors are attracted by the scenery, it does not provide a detailed evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the island has seen significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the local economy. The application neglects to analyse how the industrialisation of the seascape and a decline in environmental quality would affect Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it is impossible to

determine if the development would provide a net economic benefit or harm this vital and growing sector.

Furthermore, the assessment overlooks the critical role that environmental quality plays in attracting tourists, particularly the significance of unspoiled landscapes and dark skies for visitor experiences. The absence of a Dark Skies Assessment adds to this shortcoming, leaving a considerable gap in understanding the effects on nature-based tourism and astro-tourism, which are emerging markets in the area.

In a community with limited economic diversity, not evaluating the impacts on tourism carries broader implications for employment, local businesses, and overall community sustainability. The lack of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

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

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency leads to a significant gap in evidence. This deficiency hampers a thorough evaluation of economic effects and suggests that the application is incomplete.

SUMMARY

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

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

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment is a material omission that hinders the competent authority's ability to

evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

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

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

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

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

Additional Comments

I don’t see any good coming from this apart from the big cats who will become ever more richer for themselves, we lose our view, we are disturbed in our sleep, our night sky will not be as beautiful as it once was, these islands are one of the last untouched places in the UK and they want to ruin it with ginormous turbines where the electricity generated won’t even power the island or the people who have to endure these awful things. Will our electricity bills be lower as a result? Absolutely not, we as islanders will receive absolutely no benefit from it I can almost assure it. Someone tell these people to put turbines up in the place they love, see how they feel then. They want people to stay on this island, all this is going to do is drive people away in the long term.

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: DECAA87A