

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

**Dear Sir/Madam**

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application fails to provide an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while the unspecified mitigation measures mean their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts 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 fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly impact the statutory tests required for consent and undermine the capacity of the competent authority to determine that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, as large turbines are positioned in close proximity to the shoreline. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In such circumstances, the precautionary principle must apply. The proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the proposal raise fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a thorough, transparent, or reliable evaluation of the likely environmental consequences of the proposal. A significant issue lies in the use of a flexible Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations. This ambiguity introduces considerable uncertainty and hampers a

consistent assessment based on worst-case scenarios. As a result, the integrity of the assessment is compromised, preventing both the public and the competent authority from grasping the true extent of environmental effects associated with the development that may ultimately be constructed.

Furthermore, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach seeks consent on the premise that environmental harm will be addressed at a later stage, obstructing any meaningful evaluation of effectiveness or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be clearly defined prior to determination.

Additionally, there are critical evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly when 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 cannot be reconciled with statutory obligations.

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

Collectively, the dependence on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The assessment of alternatives within the application is severely deficient, failing to meet the statutory obligations set by the Environmental Impact Assessment regime. It does not provide a structured or reasoned comparison of viable alternatives based on their environmental impacts; instead, it presents a narrative of project development. This methodology does not adequately demonstrate that less harmful options have been identified, assessed, and chosen over more damaging alternatives.

There is a lack of a transparent, evidence-based comparison concerning alternative offshore locations, development scales, or design configurations. Notably, the

application does not establish that the developer has thoroughly considered the possibility of situating turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, along with the critical significance of proximity to shore in evaluating impact, underscores the importance of this analysis. The absence of such a consideration obstructs any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the evaluation of cable routing and landfall, where the evidence presented fails to show that alternative routes have been adequately investigated to mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation through design has not been employed; instead, the application relies on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, hindering the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be asserted that the proposal constitutes a sustainable or compliant solution in accordance with policy requirements.

From a policy standpoint, this shortcoming undermines adherence to the National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that culminates in the conclusion that the application has not undergone sufficient evaluation to enable a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The evaluation of marine ecology and protected species is fundamentally flawed, leading to an inadequate understanding of the ecological receptors within the West Lewis coastal environment. This region is a sensitive and biologically vibrant marine system, yet the baseline data provided is incomplete. The methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation necessary for assessing potential impacts.

One significant oversight in this evaluation is the failure to properly acknowledge otters, a European Protected Species, and their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in a lack of adequate assessment regarding the effects of construction disturbance, noise, and increased activity. This deficiency undermines any conclusions regarding the lack of significant effects on this species.

In addition, the assessment of basking sharks suffers from reliance on aerial surveys

that create a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to land-based observations that indicate frequent use of these waters. The failure to integrate or properly consider such crucial data results in a flawed baseline and diminishes the reliability of the conclusions drawn.

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

Regulatory requirements are not met, as the application fails to accurately identify or assess protected species, contravening the principles of the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these circumstances, consent cannot be granted lawfully.

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, leading to the conclusion that the application lacks a sufficient evidential basis.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development is fundamentally unreliable, marked by significant gaps in evidence and internal contradictions that call into question its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide the necessary evidential standard to demonstrate that these species will not face adverse impacts. The turbines are proposed within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

A critical inconsistency arises within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, a mechanism that is only invoked when significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn lack support from the underlying evidence. Furthermore, the assessment does not adequately demonstrate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not sufficiently recognised, and reliance on modelling approaches introduces considerable uncertainty, especially for species that are severely declining, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses of the birds

are not fully understood.

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

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

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

In conclusion, the assessment is characterised by internal inconsistency, methodological weaknesses, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment fails to adequately address the cultural heritage and community identity associated with the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are intertwined. The application treats heritage as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant oversight is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment reduces them to static features. This failure to acknowledge their continued use and significance, along with the potential impacts of development on their setting, results in an incomplete understanding of cultural effects, neglecting their integral role in community life.

Moreover, the assessment omits intangible cultural heritage elements, such as the Gaelic language, local traditions, and the community's long-standing connection to the coastal environment. These aspects are essential to the area's identity but are not considered, which is a major oversight. Without an examination of these elements, the true cultural impact of the development cannot be adequately evaluated.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking

population has a distinctive cultural identity recognised as characteristic of an Indigenous People; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and contradicts established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The competent authority cannot fulfil its legal duty to assess the social, cultural, and economic impacts on the island community without this assessment, making the determination potentially unlawful.

From a policy perspective, these shortcomings place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly contravenes policy mandates.

Ultimately, the lack of assessment concerning 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 explored, and the application does not offer a sufficient foundation for appraising the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The evaluation of social impacts, health, and wellbeing associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a lawful assessment. Although the developer engaged in a Social Impact Assessment that included local residents through focus groups, the complete report remains unpublished. This significant evidential gap hinders both the public and the competent authority from grasping the full extent of the social risks identified by the developer's own research.

Residents have reported experiencing measurable stress, anxiety, and concern resulting from the scale and proximity of the proposed development. These impacts, arising from direct engagement with the community, are based on real experiences rather than speculation. Nonetheless, the absence of the full assessment inhibits proper examination of these findings and restricts the ability to assess their implications in the decision-making process.

Furthermore, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition, these significant impacts have not been fully accounted for in the main application or given the necessary weight. The lack of transparency surrounding the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this nature, particularly when community character and functionality may be at stake. By failing to provide the complete dataset, the application lacks a thorough evidential basis for weighing benefits against potential harms.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate 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 established.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This deficiency precludes a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not sufficiently reflect the extent of change or the sensitivity of the environment it addresses. The West Lewis coastline is characterised by an open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, fundamentally transforming this character and leading to a permanent alteration of the landscape.

The application falls short in representing the scale of the visual changes anticipated. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would detrimentally affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately convey the significance of these impacts within such a sensitive landscape context.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises concerns that the assessment may have understated the magnitude of visual impacts, thereby undermining its reliability.

Moreover, the assessment neglects to consider the interconnectedness of landscape,



seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation disregards their interdependence and results in an incomplete evaluation of impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these vital connections, changing the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently evaluated within the application.

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

It is evident that the impacts identified cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Therefore, the anticipated changes are fundamentally permanent and cannot be reduced to an acceptable level through any mitigation measures.

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

## **CONSTRUCTION AND POLLUTION RISKS**

The absence of detailed management plans is a significant flaw in the application, which relies heavily on undefined future measures. This deferral of critical environmental safeguards prevents an adequate evaluation of whether the necessary protections against pollution events are in place. Without robust emergency response procedures and contingency planning prepared prior to consent, there is a procedural risk that undermines the authority's ability to assess environmental protection measures effectively.

The sensitivity of the West Lewis coastline heightens concerns regarding the incomplete assessment of construction and pollution risks. This area is home to clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for chemical or oil spills, it fails to provide sufficient detail on how these risks will be mitigated or monitored effectively.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without



robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on already identified sensitive marine species and habitats within the broader assessment.

From a regulatory standpoint, the failure to include detailed Construction Environmental Management Plans or Pollution Prevention Plans contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and necessary mitigations are assessed prior to the granting of consent. The application's deficiencies in demonstrating compliance with policy requirements related to environmental protection and water quality further illustrate its incomplete nature.

Taken collectively, the lack of clearly defined mitigation measures and uncertainty regarding potential impacts result in a materially deficient assessment. These shortcomings inhibit a thorough evaluation of construction and pollution risks and highlight the application's overall incompleteness.

## **FISHERIES AND MARINE LIFE**

The proposal raises significant concerns regarding its impact on fisheries and marine life, particularly due to its inadequate assessment of ecological and socio-economic effects. The coastal waters off West Lewis are home to a vibrant marine ecosystem and support a thriving fishing industry, yet the application does not convincingly show how these activities and habitats can be preserved without considerable disruption.

A critical flaw in the application is the presumption that fishing activities can be relocated without repercussions. There is no evidence provided that alternative fishing grounds are available or capable of absorbing the additional fishing pressure. This lack of information is crucial, as it may lead to overfishing in other areas and could have severe economic repercussions for the local fishing fleet. The absence of a thorough and evidence-based assessment inhibits a proper understanding of the implications for fisheries and the livelihoods dependent on them.

Moreover, the proposal poses significant 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 disrupt marine life across extensive distances, particularly affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population is concerning; however, the application inadequately addresses these impacts, downplaying their importance without sufficient evidence.

Additionally, the application exhibits a contradiction by acknowledging the necessity of licenses to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

The assessment also neglects to account for cumulative impacts that may arise from various pressures, including noise, habitat disturbance, 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 falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It fails to establish that the development can coexist with current marine users or avoid significant negative effects on marine biodiversity, thus undermining any argument for the proposal being a form of sustainable development.

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

### **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of onshore infrastructure is incomplete and does not account for the full impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interdependent but are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore activities include cabling across protected moorland, construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By not assessing onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully clear.

There are significant 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 evaluated or that suitable avoidance measures have been taken. This creates a gap in evidence regarding biodiversity protection.

The proposal also raises issues related to carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this

concern or prove that the overall carbon balance remains positive.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been started, raising concerns about the project's deliverability and legal compliance.

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

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

## **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 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 application for the Spiorad na Mara Offshore Wind Farm is fundamentally unfit for determination due to significant procedural and substantive shortcomings. There is a clear lack of a comprehensive evidential basis, marked by critical gaps in baseline data and the continued use of an undefined design envelope. The reliance on unspecified mitigation measures, along with the omission of vital impact pathways such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This absence of reliable information does not allow for a proper understanding of the likely significant effects or residual impacts.

Moreover, the absence of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a serious omission. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, further underscoring the application's inadequacies.

The proposal stands in direct opposition to National Planning Framework 4, failing to demonstrate sufficient protection of biodiversity, natural places, and cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, largely due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been assessed appropriately, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals lead to inconsistencies that have not met the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing any lawful conclusion that impacts may be acceptable.

The proposal would lead to substantial and irreversible changes to a highly sensitive

landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption of cultural and visual relationships would result in permanent effects that cannot be mitigated to an acceptable level.

In summary, the extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, make the application untenable. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

### **Additional Comments**

**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: E1EA684A

Member of the public 1800

**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 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.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The evaluation of marine ecology and protected species is critically inadequate, failing to provide a comprehensive and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This region is characterised by a delicate and biologically vibrant marine system, yet the baseline data remains insufficient. The methodologies employed do not adequately account for species presence, behaviour, and habitat utilisation. Consequently, the assessment does not offer a solid evidential foundation for assessing impacts.

A significant gap in this evaluation concerns otters, which are a European Protected Species. The application neglects to fully recognise and assess their active utilisation of coastal areas for foraging and movement. By failing to consider their core foraging range and behavioural patterns, the assessment inadequately evaluates the potential effects of construction disturbance, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is prone to underestimating presence, especially when compared to established land-based observations that indicate frequent use of these waters. The lack of integration or proper consideration of such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty concerning the true extent of risks posed to marine species and habitats.

From a regulatory viewpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been correctly identified or assessed. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given these circumstances, consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application presents a fundamentally flawed ornithological assessment that contains significant gaps in evidence and internal inconsistencies, which undermine its

conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment lacks a robust evaluation of the implications regarding displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, indicating that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a considerable risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations given the necessary attention.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, which precludes a lawful conclusion in favour of consent.

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

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These failings obstruct a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a proper determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The evaluation of cultural heritage and community identity is severely lacking, as it overlooks the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply interconnected. The application simplifies heritage into separate, unchanging assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice; however, the assessment designates them as static elements, failing to recognise their continued relevance, meaning, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship that the community has with the coastal environment. These aspects are vital to the identity of the area, yet they are completely omitted from the assessment, which is a significant oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity with traits 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 align with established principles of participation concerning cultural and environmental interests.

A significant procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic sites and landscapes. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear deviation from policy mandates.

Overall, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application falls short of providing a robust basis for understanding the true cultural costs associated with the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The non-disclosure of the complete Social Impact Assessment significantly hampers the evaluation of social, economic, and health impacts associated with the proposed development. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the full report, which is a substantial omission within the application. This failure to provide comprehensive information undermines the Environmental Impact Assessment process.

Available summaries suggest that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These observations are based on direct engagement with the community and not mere speculation. However, the lack of transparency regarding the full assessment restricts proper scrutiny of these findings and limits the ability to assess their importance in the decision-making process.

Moreover, there is evidence indicating that 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 social impacts have not been adequately incorporated into the main application, nor have they been given the appropriate emphasis. The omission of the complete Social Impact Assessment obscures the true social and human costs of the development.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments should enhance positive health outcomes and avoid harm, yet the evidence at hand suggests existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot confirm compliance with this policy.

Ultimately, the failure to disclose the full Social Impact Assessment, coupled with evidence of pre-existing negative impacts, results in an incomplete and unreliable evaluation. This lack of comprehensive information hinders a lawful determination and supports the conclusion that the application lacks sufficient backing.

## **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 proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment, but the assessment of construction and pollution risks is lacking in detail needed for a thorough evaluation of likely environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application, which instead relies on the preparation of mitigation and contingency measures after consent. This reliance on undefined future actions raises serious concerns, particularly considering the sensitivity of the

West Lewis coastline, which is home to clean coastal waters and vulnerable habitats at risk of sediment disturbance and contamination.

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

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

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

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

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, both of which are at risk due to the proposal in question. The assessment concerning fisheries and marine life is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. It is particularly troubling that the application assumes fishing activities can be displaced without any negative consequences. There is no evidence presented to support the claim that alternative fishing grounds are available and capable of accommodating the additional pressures that would arise. This significant omission raises the potential for overfishing in other areas, which could have detrimental economic effects on the local fishing fleet. Without a solid, evidence-based assessment, the consequences for fisheries and the livelihoods they support remain obscured.



In addition to these concerns, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended period is likely to disrupt marine life across vast distances, affecting populations such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without providing adequate supporting evidence.

Furthermore, there is an evident inconsistency within the application itself, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about its compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation. The assessment also neglects to address cumulative impacts arising from various pressures, including habitat disturbance, noise, and fishing displacement. A comprehensive evaluation of these interconnected effects is crucial to understand the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or avoid unacceptable harm to marine biodiversity, which prevents any conclusion that the proposal represents sustainable development. The deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment omits any evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The proposal includes permanent red aviation lighting that would be visible over long distances, creating a continuous “wall of light” across the western horizon and fundamentally altering the night-time environment.

The absence of an impact assessment for this lighting on visual amenity, landscape character, and the experiences of residents and visitors is particularly concerning, given the critical role dark skies play in the area's identity and the burgeoning sector of astro-tourism. This oversight results in a noticeable gap in the overall landscape and environmental evaluation.

Furthermore, the application does not consider the effects of the proposed lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and

Leach's Storm Petrel are particularly susceptible to artificial lighting due to their phototaxis behaviour, which can lead to disorientation and increased risks of collision. The lack of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and the risk of increased mortality are not addressed.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and associated risks. For instance, Kittiwakes may forage or migrate at night and are vulnerable to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be adversely impacted. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and hinders lawful determination of the application.

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

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 makes the application incomplete and unable to support a lawful determination.

## **TOURISM**

The assessment presented in the application significantly lacks thoroughness, particularly regarding its evaluation of tourism impacts, which are critical for the Isle of Lewis. Tourism relies heavily on the island's wild coastline, near-pristine landscapes, dark skies, and its overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the proposed large-scale offshore infrastructure may alter visitor numbers, behaviour, or their overall economic contribution.

Tourism on the Isle of Lewis has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while accounting for up to 16% of the local economy. Nonetheless, the application neglects to model the potential impacts that the industrialisation of the seascape and deterioration of environmental quality could have on Tourism Gross Value Added and the broader economic resilience of the area. Without such critical analysis, it remains unclear whether the proposed development could yield a net economic benefit or jeopardise this vital sector.

The current assessment fails to recognise how environmental quality is intertwined with tourism, especially the significance of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further exacerbates the issue, leading to a considerable lack of understanding regarding impacts on this recognised and expanding facet of the local economy.

Given the context of a community on an island that has limited economic diversification, the shortcomings in assessing tourism impacts carry broader implications for local employment, businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning the assessment of economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In conclusion, the failure to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the economic dependency of the island results in a significant evidential void. This deficiency obstructs a comprehensive evaluation of the economic effects and supports the assertion that the application remains incomplete.

## **SUMMARY**

The application for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the criteria of sustainable development when evaluated against statutory duties, national policy, and evidential requirements. It mirrors the critical issues associated with the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Fundamental to the assessment process is the lack of a comprehensive and reliable evidential foundation. The application reveals notable deficiencies in baseline data and continues to rely on an undefined design envelope. Moreover, it depends on mitigation measures that remain unspecified and fails to account for significant impact pathways, such as those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, obstructing a thorough understanding of probable significant effects or residual impacts.

There are also evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment represents a violation of statutory obligations under

the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These deficiencies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It fails to demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, does not substantiate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, thereby obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

The environmental risks remain uncertain and could potentially be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority is urged either to deny consent on these grounds or to invoke the appropriate regulatory measures to obtain the missing information.

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

### **Additional Comments**

The beauty of the island is found nowhere else in the world and is appreciated by many who travel far to see it for themselves. I am fortunate enough to call it my home. The wind turbines will tarnish and destroy this wild landscape that has been seen for years, this will not only affect the views but also all the wonderful wildlife that also call this beautiful land home. From working in Stornoway I have spoken to those living in areas that will be affected and they have bluntly said that they will be moving if this destruction is to go ahead. Our island is already suffering with a decline in population. This is not the answer. We should be protecting our home and its 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: 623A9098

**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 for marine licensing and Environmental Impact Assessment. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is proposed off the west side of the Isle of Lewis, an area that boasts an Atlantic-facing coastline, a near-pristine environment, and a strong cultural heritage. 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 solid evidential foundation for a lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Furthermore, essential components of the proposal remain unspecified. The reliance on a flexible design framework obscures potential significant effects, and the undefined mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, leaving the claims of negligible or non-significant effects unsubstantiated by adequate evidence.

Policy conflicts are evident and substantial. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements designed to protect biodiversity, climate concerns, and environmental integrity. These discrepancies challenge the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain the proposal's policy acceptability.

This application is unprecedented in its scale for this particular location, as it proposes large turbines situated near the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental effects. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance reveal that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report exhibits considerable deficiencies, failing to offer a thorough, transparent, or trustworthy overview of the potential

environmental effects of the proposal. A significant concern is the flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. Consequently, the integrity of the assessment is compromised, and the impacts reported may not accurately represent the development that is ultimately constructed. This lack of clarity prevents both the public and the competent authority from fully grasping the true extent of the environmental effects.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have yet to be defined. As a result, consent is sought on the premise that any environmental harm will be rectified at a later stage. This approach obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. The deferral of critical information to post-consent stages is procedurally unacceptable and contravenes the intent of the Environmental Impact Assessment framework, which mandates that likely significant effects and their mitigation must be clearly established before determination.

There are also notable evidential weaknesses, which include significant gaps in baseline data and limitations in the methodology, relying instead on assumptions rather than site-specific evidence. This leads to 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 adequate information hinders a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

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

In conclusion, the combination of reliance on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information supplied.

## **ASSESSMENT OF ALTERNATIVES**

The application presents a narrative account of project evolution rather than a structured, evidence-based comparison of alternatives. This lack of analysis is a significant shortcoming, as it does not demonstrate that less harmful options have



been identified and assessed in preference to more damaging solutions. Specifically, there is an absence of a transparent comparison of offshore locations, development scales, and design configurations. The developer has not adequately considered the possibility of placing turbines further offshore, where impacts on visual aspects, ecology, and the coast would likely be mitigated. This is particularly crucial given the sensitivity of the West Lewis coastline and the importance of proximity to shore in determining environmental impacts.

Furthermore, the assessment of cable routing and landfall lacks sufficient evidence that alternative routes have been explored to minimise effects on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to provide a clear avoidance strategy, alongside the lack of comparative analysis, indicates that mitigation by design has not been adequately applied, leading to a reliance on post-design measures. Consequently, the application does not demonstrate that environmental harm has been minimised through careful consideration of site selection, layout, and infrastructure routing. This inadequacy represents a departure from the established mitigation hierarchy, inhibiting the competent authority from determining whether more suitable alternatives exist.

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, which emphasises the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission, reinforcing the overall conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The evaluation of marine ecology and protected species is incomplete and does not give a reliable understanding of ecological receptors in the West Lewis coastal area. This region is a sensitive and biologically rich marine environment, yet the baseline data is lacking, and the methods used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a solid evidential foundation for determining impacts.

A significant shortcoming involves otters, which are a European Protected Species. The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that potential effects from construction disturbances, noise, and increased activity have not been thoroughly evaluated. This weakens any assertions made regarding the lack of significant effects on this species.

Further issues arise in the assessment of basking sharks. The reliance on aerial surveys creates a notable detection bias, especially under Atlantic conditions, likely leading to an underestimation of their presence. In contrast, established land-based observations indicate that these waters are frequently used by basking sharks. The failure to properly consider such data results in an incomplete baseline and diminishes the reliability of

the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based more on assumptions than on strong evidence. The lack of sufficient baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the real risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. This uncertainty means that adverse effects cannot be excluded beyond reasonable scientific doubt, activating the precautionary principle. Therefore, consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development is fundamentally flawed, with substantial gaps in evidence and inconsistencies that call into question 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 does not meet the necessary evidential standard to demonstrate that these species will remain unharmed. Key foraging areas and migratory pathways are located within the development site, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself, as the developer concludes there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment, suggesting that its conclusions lack adequate support from the evidence provided. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will not be affected. The vital importance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling approaches introduces a degree of uncertainty, especially for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate potential mortality, particularly when baseline data is lacking and behavioural responses remain inadequately understood.

The siting of turbines within a designated migratory corridor creates an additional risk, posing a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not properly assess the long-term consequences of ongoing mortality in this corridor or the potential impacts on species

with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

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

In summary, the assessment is unreliable due to its internal contradictions, methodological shortcomings, and lack of sufficient evidence. These issues hinder a thorough evaluation of the impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for a lawful determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The evaluation of cultural heritage and community identity within the application is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape in which the environment, language, traditions, and community are deeply interconnected. The approach taken reduces heritage to a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual roles in the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas exemplify a significant oversight. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features, with the assessment disregarding their continued use, significance, and the potential impacts of development on their settings. This misunderstanding leads to an incomplete evaluation of cultural effects and overlooks their integral role in community life.

Moreover, there is a troubling absence of consideration for intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the enduring relationship between the community and its coastal environment. These elements are pivotal to the area's identity but are entirely neglected in the assessment, indicating a substantial gap in understanding the cultural impact of the proposed development.

The application also demonstrates a lack of engagement with community rights, particularly regarding the Gaelic-speaking population, which possesses distinct cultural identity characteristics recognised as those of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises concerns about the

legitimacy of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

A further procedural shortcoming is the failure to provide a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these inadequacies position the proposal in direct contradiction to the National Planning Framework 4, especially concerning the preservation of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices signify a clear violation of policy requirements.

In conclusion, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a sufficient basis to assess the true cultural costs associated with the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The transparency surrounding the social impacts, health, and wellbeing related to this proposal is critically lacking, which significantly undermines the evaluation process. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence of information creates a substantial evidential gap, inhibiting both public understanding and the ability of the competent authority to assess the social risks highlighted by the developer's own research.

Residents have reported experiencing stress, anxiety, and concern directly associated with the scale and proximity of the proposed development. These impacts stem from direct engagement and are firmly rooted in evidence, not conjecture. However, without access to the complete assessment, the findings cannot undergo adequate scrutiny, limiting the capacity to evaluate their significance during the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with indications of "cultural loss" emerging from the developer's own findings. These impacts have not been thoroughly incorporated into the main application or afforded appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also compromises the integrity of the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they could affect community character and functioning. The absence of the complete data set

results in a failure to provide a thorough evidential basis necessary for weighing the benefits against the harms.

From a policy standpoint, the application falls short in demonstrating adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been adequately disclosed. Consequently, it is impossible to show compliance with this policy without the full assessment.

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

In summary, the non-disclosure of the full Social Impact Assessment, along with documented evidence of existing adverse impacts, renders the assessment incomplete and untrustworthy. This inadequacy obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment related to seascape, landscape, and visual impacts is insufficient and does not capture the true scale of change or the vulnerability of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a persistent industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately conveys the extent of this visual alteration. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal spots. This would negatively affect visual amenity and detract from the essential qualities of naturalness and remoteness. The assessment does not accurately depict this level of impact or its significance within such a delicate landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence that these viewpoints do not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact's magnitude has been downplayed, compromising the assessment's reliability.

Another shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The

assessment treats these sites as separate entities, failing to acknowledge their interdependence and resulting in an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact but also a wider cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is at odds with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertions of policy compliance.

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

In conclusion, the assessment fails to accurately reflect the impact scale, the environment's sensitivity, 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 raises significant concerns regarding the environmental assessment related to construction and pollution risks, which is markedly incomplete and lacks essential details for evaluating potential environmental impacts. There is a plan for substantial seabed preparation and installation works in a challenging Atlantic environment, yet the necessary Construction Environmental Management Plans and Pollution Prevention Plans are not fully developed. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent, hindering any meaningful evaluation of their effectiveness or adequacy.

This reliance on unspecified future measures is alarming, particularly considering the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty

also extends to the potential effects on marine species and habitats that have been identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to assess whether there are sufficient safeguards to address pollution events. This introduces procedural risks and weakens the capacity of the competent authority to evaluate the environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is crucial for likely significant effects and mitigation to be assessed prior to consent, and in the absence of this information, a lawful determination cannot occur. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of specified mitigation measures, inadequate management plans, and the uncertainty surrounding potential impacts lead to a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The application presents an inadequate assessment of fisheries and marine life, lacking a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast support a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate how these important uses and habitats can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be relocated without negative consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can handle additional pressure. This lack of information is critical, as displacing fishing efforts could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, especially due to underwater noise produced during construction activities. The high-energy hammer piling planned for an extended duration is expected to disturb marine life over large distances, notably affecting species like dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

There is a clear contradiction in the application where it acknowledges the need for licences to harm European Protected Species while simultaneously describing those



impacts as negligible. This inconsistency undermines the validity of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and fishing activity displacement. A comprehensive evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

### **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts from this single integrated project. The offshore turbines and the onshore works are closely connected; however, they are evaluated independently. This fragmented approach masks the true extent of the environmental and socio-economic repercussions.

Included in the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon store and is an ecologically delicate habitat. The application fails to provide a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively; yet, the division of offshore and onshore components results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that adequate avoidance measures have been implemented. This reveals a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises concerns about deliverability and lawful implementation.

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

In summary, the disjunction of project components, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thereby obstructing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The 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 address the assessment of dark skies and nocturnal wildlife, representing a significant omission. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment and negatively impact the visual amenity, landscape character, and experiences of residents and visitors. The failure to evaluate these lighting impacts is particularly concerning, especially in relation to the importance of dark skies to the region’s identity and the emerging tourism sector of astro-tourism.

Additionally, the application does not assess the potential impacts on nocturnal wildlife, despite species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel being sensitive to artificial lighting due to phototaxis. This sensitivity can lead to disorientation and increased collision risk, yet the proposal lacks any lighting impact assessment or phototaxis study. Without such evaluations, the application fails to consider how the proposed aviation lighting may affect these species and contribute to increased mortality rates. Furthermore, the reliance on daytime survey data in the ornithological assessment overlooks nocturnal activity and related risks. Species like Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, and this risk remains unassessed.

The absence 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 would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination. From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the landscape.

In summary, the lack of assessment regarding 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 unable to support a lawful determination.

## **TOURISM**

The assessment of tourism impacts is critically inadequate, failing to analyse the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it neglects to provide any quantitative analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

The economic significance of tourism has been notable, with growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not address how the industrialisation of the seascape and deterioration of environmental quality might affect the Tourism Gross Value Added or the broader economic resilience. In the absence of this analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector.

The omission of a Dark Skies Assessment further exacerbates the issue, as it overlooks the critical role of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are integral to visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. This lack of consideration highlights a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given that the island community has limited economic diversification, the oversight in assessing tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The failure to conduct a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the

National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefit. It contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental influences on visitor behaviour, and acknowledge the economic dependency of the island culminates in a significant evidential void. This hinders a thorough evaluation of economic effects and supports the assertion that the application remains incomplete.

## SUMMARY

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

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

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

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

Environmental risks associated with the proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific

doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

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

### **Additional Comments**

Having lived on the island my entire life, I intend on continuing to live here and starting a family in the future. Seeing the quiet island life that so many love destroyed would be heartbreaking. This island isn't just where people come on holiday, this is where I live and work and this development will bring nothing but destruction.

**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: 93926A3A

**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 marine licensing and Environmental Impact Assessment frameworks. The objection is founded on a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural implications, and procedural integrity. Located off the west coast of the Isle of Lewis, the development is situated in an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The design, scale, and proximity of the proposed development raise serious concerns about its compliance with statutory obligations, national policy, and sustainable development principles.

There is an alarming lack of a sound evidential foundation within the application, as critical environmental data is absent, baseline information remains limited and inconsistent, and essential components of the proposal are not defined. The flexible design framework undermines the ability to assess likely significant effects, while the reliance on unspecified mitigation measures hampers any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence to support them.

The proposal presents clear and serious policy conflicts, appearing 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 demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and cast doubt on the ability of the competent authority to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal, with large turbines positioned perilously close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and apparent policy non-compliance illustrates that the application is fundamentally incomplete and incapable of securing a lawful determination. Given these circumstances, the precautionary principle must be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency, leading to an unreliable depiction of the potential environmental consequences of the proposed development. The incorporation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This aspect obstructs a consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. As a result, the environmental impacts presented may not accurately represent the final development, hindering both public understanding and the competent authority's capacity to gauge the true extent of the environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be managed later precludes any substantive evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unsound and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated prior to determination.

Furthermore, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where findings of negligible or non-significant effects are advanced without robust supporting data. The lack of adequate information inhibits a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes mandates related to biodiversity protection and environmental integrity, as it is not shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the deficiencies arising from the undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data contribute to an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information submitted.

## **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.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a vibrant cultural landscape where language, tradition, environment, and community are deeply interwoven. The approach

adopted in the application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, spiritual, and cultural significance within the community.

Particularly troubling is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which are active burial and spiritual sites. The assessment wrongly categorises these locations as static features, overlooking their continued use and meaning. This mischaracterisation leads to an incomplete evaluation of the cultural effects of the proposed development and fails to acknowledge the vital role these sites play in community life.

Intangible cultural heritage has also been disregarded in the assessment, notably the Gaelic language, traditions, and the established relationship between the local community and the coastal environment. These critical elements, integral to the identity of the area, are entirely omitted, representing a significant oversight that hampers a comprehensive understanding of the cultural impact of the development.

Concerns about community rights and engagement further exacerbate these issues. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. This lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination unattainable.

From a policy perspective, these inadequacies place the proposal in direct opposition to the National Planning Framework 4, particularly concerning the preservation of historic assets and places. The failure to account for both tangible and intangible heritage, alongside the neglect of living cultural practices, clearly deviates from established policy requirements.

In conclusion, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, and the application lacks a sufficient basis for accurately determining the true cultural costs associated with the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The failure to disclose the full Social Impact Assessment is a critical issue that undermines the entire evaluation process. The competent authority is unable to conduct a thorough socio-economic and health assessment without access to this

essential document, resulting in a significant material omission within the application. This lack of transparency not only contravenes the evidential requirements of the Environmental Impact Assessment regime but also hinders the ability to determine the true human and social costs associated with the proposed development.

Available summaries reveal that local residents are already grappling with measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community, underscoring their significance. However, without the full assessment being made available for scrutiny, it is impossible to fully grasp the implications of these findings within the decision-making framework.

Moreover, evidence indicates that the development is seen as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Yet, these critical impacts have not been adequately integrated into the main application or given the weight they deserve. The withholding of the complete Social Impact Assessment thus obscures a comprehensive understanding of the social risks involved.

From a policy standpoint, the application fails to align with National Planning Framework 4 concerning health and wellbeing. The development must not only support positive health outcomes but also avoid causing harm. However, the evidence currently available points to existing adverse effects that remain undisclosed. This lack of clarity prevents any demonstration of compliance with the relevant policy.

The overall assessment of social impacts, health, and wellbeing is materially deficient and lacks the required transparency for a lawful evaluation. Consequently, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable assessment, ultimately preventing a lawful determination and reinforcing the assertion that the application lacks sufficient information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment regarding the seascape, landscape, and visual impacts is critically inadequate and fails to capture the true extent of change alongside the sensitivity of the environment. The character of the West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped landscape, and a pronounced sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish a continuous industrial presence, fundamentally transforming this character and resulting in a permanent alteration to the landscape.

Moreover, the application does not sufficiently portray the magnitude of the anticipated visual change. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This development would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and landscapes of high value. This raises concerns that the magnitude of visual impact has been underestimated, thus compromising the reliability of the assessment.

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

The proposed industrialisation of the seascape threatens to sever these connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This represents not merely a visual impact but a wider cultural and spatial detriment that has not been adequately accounted for in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural spaces and historic assets. The anticipated scale of change is fundamentally incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines claims of compliance with relevant policy.

It is evident that the identified impacts cannot be satisfactorily mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and inescapable. The resultant transformation is thus not something that can be moderated to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a dependable evaluation and strongly suggest that the proposal is incompatible with the protection of this important landscape.

## **FISHERIES AND MARINE LIFE**

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

livelihoods of the local fishing fleet.

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

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction raises serious concerns regarding compliance with the Habitats Regulations, particularly in instances where harm is anticipated to a level requiring legal authorisation.

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

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The lack of assessment regarding nocturnal wildlife and dark skies represents a significant evidential gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly emerging sectors like astro-tourism. The proposed introduction of permanent red aviation lighting, which would be visible over considerable distances, threatens to create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly alarming given the crucial role dark skies play in the area's identity. The absence of these assessments indicates a substantial gap in the landscape and environmental evaluation.

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased risks of collision. The lack of a lighting impact assessment or phototaxis study means that there has been no evaluation of how the proposed aviation lighting may impact these species or contribute to increased mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and the associated risks. Other species like Kittiwakes, which may forage or migrate at night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leads to a critical lack of understanding concerning ecological impacts.

Without a thorough assessment of nocturnal effects, it remains 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 fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife comprehensively indicates 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 fails to adequately assess the tourism impacts, which are crucial for the economy of the Isle of Lewis. Tourism relies heavily on the area'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, yet it does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced significant growth, escalating from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the assessment neglects to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added and the wider economic resilience. Without this analysis, it remains unclear if the proposed development would provide a net economic benefit or detract from a sector that is already established and flourishing.

Additionally, the application does not adequately consider the role of environmental quality in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences. This is especially important for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the potential impacts on a recognised and expanding sector of the local economy.

In an island community that has limited economic diversification, the inadequate assessment of tourism impacts has 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, 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 a net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector, failing to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

## **SUMMARY**

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally unfit for determination due to significant procedural and substantive shortcomings. There is a clear lack of a comprehensive evidential basis, marked by critical gaps in baseline data and the continued use of an undefined design envelope. The reliance on unspecified mitigation measures, along with the omission of vital impact pathways such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This absence of reliable information does not allow for a proper understanding of the likely significant effects or residual impacts.

Moreover, the absence of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a serious omission. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, further underscoring the application's inadequacies.

The proposal stands in direct opposition to National Planning Framework 4, failing to demonstrate sufficient protection of biodiversity, natural places, and cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable, nor does it



provide evidence of a net economic benefit, largely due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been assessed appropriately, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals lead to inconsistencies that have not met the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing any lawful conclusion that impacts may be acceptable.

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

In summary, the extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, make the application untenable. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

### **Additional Comments**

I have family connections to the West side of Lewis. You are destroying paradise, and it makes me not want to continue visiting with my family. Scotland doesn't need more wind farms. Build it somewhere where the energy is needed.

**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: AC360467

**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 fundamentally inadequate, failing to deliver a comprehensive, transparent, or dependable account of the expected environmental consequences of the proposal. A flexible Project Design Envelope is employed without firm commitments to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and hinders the consistent application of a worst-case scenario. Such a lack of clarity compromises the

assessment's integrity and obscures the true extent of the environmental impacts, preventing both the public and the competent authority from fully grasping the potential effects of the development.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought based on the premise that environmental harm will be mitigated in the future, which obstructs a meaningful evaluation of the effectiveness of these measures and assessment of any residual impacts. This postponement of essential information to post-consent stages is procedurally improper and contradicts the intention of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly defined prior to decision-making.

The report also suffers from critical evidential shortcomings, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty surrounding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. This lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory obligations.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to the National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are established.

Collectively, the dependence on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information available.

## **ASSESSMENT OF ALTERNATIVES**

The evaluation of alternatives in the application is fundamentally inadequate and fails to satisfy the statutory requirements mandated by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental impacts, the submission provides merely a narrative of the project's development. This methodology does not demonstrate that less harmful options have been sufficiently identified, assessed, and selected over more damaging alternatives.

A clear and evidence-driven comparison of different offshore locations, varying development scales, or design configurations is absent. Notably, the application does

not prove that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact, the lack of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient documentation that alternative routes have been adequately examined to avoid or mitigate effects 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 suggest that there has been no application of mitigation by design, instead relying heavily on measures to mitigate post-design.

Consequently, the application does not establish that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it is impossible to determine that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a significant shortcoming that contributes to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The proposed development has significant shortcomings in its assessment of marine ecology and protected species, which ultimately undermines understanding of the ecological receptors within the West Lewis coastal environment. This region is known for its sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A major gap exists in the analysis concerning otters, a European Protected Species. The application neglects to properly acknowledge and assess their active utilisation of coastal areas for foraging and movement. This oversight means that the evaluation of potential effects from construction disturbance, noise, and increased activity is insufficient, which calls into question the conclusions drawn regarding the absence of significant effects on this species.

Further concerns arise regarding the assessment of basking sharks, as the reliance on

aerial surveys introduces considerable detection bias, particularly in challenging 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 adequately incorporate or consider such data results in an incomplete baseline and diminishes the credibility of the conclusions offered.

These methodological flaws mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These weaknesses hinder a thorough evaluation of the impacts on marine ecology and protected species, contributing to the overall determination that the application does not possess a sufficient evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment conducted raises serious concerns regarding its reliability, primarily due to internal inconsistencies and methodological weaknesses. The development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Despite this critical context, the application fails to meet the evidential threshold necessary to demonstrate that these species will not be adversely affected. It does not adequately evaluate the implications of displacement, collision risk, or habitat loss, leaving significant gaps in evidence.

A fundamental contradiction arises within the application itself, as the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is anticipated, thus casting doubt on the validity of the assessment and its conclusions. Moreover, there is insufficient evidence provided that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is not fully considered, and reliance on modelling approaches contributes to uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are

likely to underestimate mortality rates, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents a further significant risk, effectively creating a barrier along a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The application does not sufficiently 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 fulfil the evidential requirements needed to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, data gaps, and limitations inherent in the modelling render the standard of beyond reasonable scientific doubt unachievable. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion that would support consent.

In addition, the identified deficiencies indicate a failure to comply with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is fundamentally flawed and cannot support the determination of the application due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment fails to adequately consider the West Lewis coastline as a living cultural landscape, where environment, language, tradition, and community are interconnected. The application adopts a simplistic view of heritage, treating it merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A significant oversight is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are classified as static features, neglecting their continued use and importance as well as the impact that development may have on their surrounding environment. This mischaracterisation leads to an inadequate assessment of cultural effects and overlooks their vital role in community life.

Moreover, the application does not address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are essential to the area's identity and are conspicuously missing from the assessment, which constitutes a significant omission. Without acknowledging these factors, the cultural implications of the development remain poorly understood.

Further issues arise concerning community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot properly fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This single omission prevents 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 disregard for both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application does not offer an adequate basis for understanding the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing raises significant concerns regarding the legality of the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Summaries indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These findings stem from direct engagement and are thus firmly grounded in evidence rather than speculation. Nevertheless, the lack of access to the full assessment impedes proper scrutiny of the findings and limits the determination of their significance within the broader decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings highlighting concerns around “cultural loss.” Despite this, such impacts have not been adequately incorporated into the primary application nor afforded the appropriate weight in the evaluation. The failure to disclose the complete Social Impact Assessment conceals



the true human and social costs associated with the proposed development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By not providing the complete dataset, the application lacks the necessary evidential foundation to properly assess the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, existing evidence suggests there are adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be adequately demonstrated.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to adhere to the evidential standards set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with the documented existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts does not adequately reflect the scale of change or the sensitivity of this environment. The introduction of large-scale turbines near the shoreline would create a dominant industrial presence, fundamentally altering the character of the landscape and resulting in a permanent transformation.

The application fails to accurately portray the magnitude of the visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This domination would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not properly convey this level of impact or its significance in such a sensitive landscape.

Moreover, there are concerns regarding the methodology used to select and present 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. This raises the possibility that the magnitude of the visual impact has been understated, thereby

undermining the reliability of the assessment.

Another deficiency is the lack of assessment of the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated assets without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt the relationships between these heritage assets and alter the context in which they are experienced. This disruption not only represents a visual impact but also a broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding 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 settings of culturally significant sites. The absence of a robust worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is fundamental and permanent, making it impossible to reduce to an acceptable level through mitigation.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These 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 presents significant deficiencies in its assessment of construction and pollution risks, which are crucial for evaluating potential environmental effects. It involves extensive seabed preparation and installation work in a high-energy Atlantic environment, yet fails to provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures to be formulated after consent is granted, hindering any thorough assessment of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises substantial concerns, particularly given the sensitivity of the local 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 such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on strategies for prevention, control, or monitoring of these issues.

There is also significant uncertainty surrounding the scale and behaviour of sediment plumes that could result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

Furthermore, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be evaluated before consent can be granted, and without this crucial information, a lawful determination cannot be reached. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The proposal presents significant deficiencies in the assessment of fisheries and marine life, failing to offer a thorough evaluation of the ecological and socio-economic impacts on the waters off the West Lewis coast. This area supports a vibrant marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without facing substantial disruption.

A critical concern is the flawed assumption that fishing activities can be easily displaced without any repercussions. The application lacks evidence to suggest that alternative fishing grounds are available or capable of accommodating additional pressure. This significant omission raises the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods of those dependent on them remain poorly understood.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over vast

distances, adversely affecting species such as dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population is alarming; however, the application minimises these effects without providing sufficient supporting evidence.

The application reveals an inconsistency regarding the necessity for licences to permit harm to European Protected Species while simultaneously describing those impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and displacement of fishing activities. The failure to comprehensively evaluate these combined effects means that the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus hindering any conclusion regarding the proposal's sustainability.

Overall, the lack of evidence related to fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment render it incomplete and unreliable. These shortcomings obstruct a proper evaluation of the potential impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

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

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

By neglecting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered as a whole.

However, the separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are inadequately understood.

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

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

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, which raises serious questions about the deliverability and lawful implementation of the project.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The Environmental Impact Assessment fails to include an assessment of dark skies and nocturnal wildlife, which is a significant oversight. The coastline of West Lewis is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting that is visible over long distances would create a continuous "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the importance of dark skies for the area's identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts reveals a significant gap in the environmental and landscape assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially

vulnerable to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a heightened risk of collision. The application does not present a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may impact these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not account for nocturnal behaviours or associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation caused by artificial lighting, yet this risk remains unassessed. The absence of specific night-time data critically limits the understanding of ecological impacts.

Without an evaluation of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and hindering lawful decision-making.

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

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

## **TOURISM**

The application does not adequately address the tourism impacts that are crucial to the economy of the Isle of Lewis. With tourism reliant on the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness, the application's acknowledgment that 86% of visitors are attracted by scenery is insufficient. There is no quantified assessment of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

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

The environmental quality that underpins tourism is not sufficiently considered, particularly regarding the significance of unspoiled landscapes and dark skies for visitor

experience, as well as for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on a growing segment of the local economy.

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

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

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

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal does not adequately address these critical concerns.

Significant gaps in baseline data and the continued use of an undefined design envelope undermine the reliability of the application. Additionally, it relies on unspecified mitigation measures and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, obstructing a comprehensive understanding of potential significant effects or residual impacts.

There are notable procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment is a material omission. These deficiencies hinder the competent authority from accurately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.



The proposal contradicts National Planning Framework 4, failing to illustrate the protection of biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been adequately evaluated, obscuring implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unsuitable for determination. The multitude of information deficiencies, combined with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

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

### **Additional Comments**

It's an abomination of our land. Sea , air and health. Absolutely NOT NECESSARY. .

**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: 8BBABA88

**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 marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's scale, proximity to the shoreline, and design, all of which question its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. There is a critical absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Several key aspects of the proposal are undefined, and the flexible design framework used hinders a comprehensive understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a complete and informed overview of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack solid evidence.

The proposal faces clear and substantial policy conflicts. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's capacity to deem the development acceptable from a policy standpoint.

Given the unprecedented scale of the proposal in this location, with large turbines situated close to the shoreline, there are significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report presents several significant deficiencies that undermine its reliability and completeness. Notably, the proposal's use of a flexible Project Design Envelope lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces uncertainty and obstructs the application of a worst-case scenario, consequently compromising the integrity of the assessment. As a result, the presented impacts may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from fully grasping the extent of environmental effects.

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

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

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

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

## **ASSESSMENT OF ALTERNATIVES**

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

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

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

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

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

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The 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.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application presents an ornithological assessment that is fundamentally flawed, suffering from significant evidence gaps and internal contradictions that severely compromise its conclusions. The site on the west coast of the Isle of Lewis is critical for internationally significant seabird populations, which are already experiencing declines. However, the application fails to adequately demonstrate, to the required evidential standard, that these species will not be adversely impacted. It is situated within vital foraging areas and migratory routes, yet the assessment inadequately addresses the potential consequences of displacement, collision risks, or habitat loss.

Contradictions are evident in the application as the developer claims there are no significant adverse effects while concurrently submitting a Habitats Regulations derogation case, necessitated only where significant harm is anticipated. This

inconsistency raises doubts about the assessment's reliability, suggesting that the conclusions drawn are not substantiated by the underlying evidence.

The assessment lacks sufficient proof that seabird species associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling methodologies introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. There is a high likelihood that mortality rates are underestimated due to incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the location of turbines within a recognised migratory corridor poses a considerable risk, potentially creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor and the impact on species with small global populations have not been thoroughly assessed.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory assertions, combined with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

Overall, the identified deficiencies highlight a failure to comply with the National Planning Framework 4, particularly 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. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise this area as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic view of heritage, treating it as a collection of isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming of the assessment is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not just static features; they serve as active places for burial and spiritual practice. The assessment's failure to consider their continued use and the impact of development on their surroundings leads to a limited understanding of cultural effects and neglects

their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language and local traditions, as well as the community's enduring relationship with the coastal environment, is not adequately addressed. These aspects are fundamental to the area's identity but are completely omitted from the assessment, representing a significant oversight. Without considering these essential factors, the full cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the credibility of the assessment and does not adhere to established principles of participation for decisions that impact cultural and environmental interests.

A critical procedural lapse is evident in the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the assessment insufficient for lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with an absence of recognition for living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently evaluated, leaving the application without a proper foundation for understanding the true cultural costs associated with the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

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

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



and the evaluation of their significance in the decision-making process.

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

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the evidence suggests existing adverse effects that have not been fully disclosed. Consequently, the absence of the full assessment makes it impossible to demonstrate compliance with this policy.

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

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The evaluation of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently address the degree of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately portray the extent of this visual change. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the true extent of visual impact has been underestimated, which calls into question the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than recognising these sites as interdependent, the assessment treats them as isolated entities, resulting in a partial evaluation of their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a broader cultural and spatial detriment that has not been adequately evaluated within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change proposed is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines claims of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Thus, the resulting change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings inhibit a trustworthy evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal raises significant concerns regarding the environmental assessment related to construction and pollution risks, which is markedly incomplete and lacks essential details for evaluating potential environmental impacts. There is a plan for substantial seabed preparation and installation works in a challenging Atlantic environment, yet the necessary Construction Environmental Management Plans and Pollution Prevention Plans are not fully developed. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent, hindering any meaningful evaluation of their effectiveness or adequacy.

This reliance on unspecified future measures is alarming, particularly considering the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have been identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to assess whether there are sufficient safeguards to address pollution events. This introduces procedural risks and weakens the capacity of the competent authority to evaluate the environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is crucial for likely significant effects and mitigation to be assessed prior to consent, and in the absence of this information, a lawful determination cannot occur. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of specified mitigation measures, inadequate management plans, and the uncertainty surrounding potential impacts lead to a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The application lacks a comprehensive assessment of the impacts on fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic factors. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, there is no demonstration that these vital habitats and activities can be preserved without significant disruption.

A major concern is the assumption that fishing activity can simply be relocated without adverse effects. The application does not provide evidence regarding the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This oversight is critical because displacing fishing efforts could lead to overfishing in other areas and result in broader economic repercussions for the local fishing fleet. Without

a rigorous, evidence-based assessment, the implications for both fisheries and livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population raises serious issues. Yet the application minimises these effects without adequate supporting evidence, which is concerning.

Moreover, there exists a contradiction within the application regarding the need for licences to authorise harm to European Protected Species while concurrently classifying the impacts as negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially in contexts where harm is anticipated to a level requiring legal permission.

Additionally, the assessment overlooks cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application does not meet the standards set by National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion regarding its sustainability.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the project fails to provide a complete picture of the impacts associated with what constitutes a single integrated development. The offshore turbines and onshore works are inherently connected, yet they are evaluated separately, resulting in a fragmented analysis that obscures the actual environmental and socio-economic effects.

Onshore activities include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. These operations entail excavation through areas of deep peat, particularly in Barvas Moor, an important carbon store and ecologically delicate habitat. The application lacks a thorough assessment of these implications, hindering a full understanding of the project's overall environmental footprint.

Furthermore, the exclusion or postponement of onshore impact assessments prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore aspects obscures the combined impacts on peatlands, habitats, and local communities.

There are serious concerns regarding risks to sensitive habitats, such as machair systems and peatland environments, which have policy protections in place. The application fails to demonstrate that the effects on these ecosystems have been fully evaluated or that suitable avoidance measures are in place, highlighting a significant evidential gap in biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use rights. The application does not provide sufficient evidence that the necessary consents or processes have been initiated, which leads to concerns about the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to show protection for peatlands, habitats, and land use interests contradicts the objectives of the National Marine Plan and National Planning Framework 4. The inability to confirm that impacts can be avoided or mitigated further undermines the application.

In summary, the disconnection between project components, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, impeding a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment notably lacks an evaluation of dark skies and nocturnal wildlife, representing a significant omission. The proposal suggests introducing permanent red aviation lighting, which would be visible over long distances, creating an intrusive “wall of light” effect across the western horizon. This would drastically alter the night-time environment.

The application fails to consider the impact of this lighting on visual amenity, landscape character, and the experience of both residents and visitors. The importance of dark skies to the area's identity and its developing tourism sectors, such as astro-tourism, makes this oversight particularly concerning. This lack of assessment results in a clear gap in the overall landscape and environmental evaluation.

Furthermore, there is no analysis of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or

phototaxis study, failing to address how aviation lighting may affect these species and potentially raise mortality rates.

The situation is further complicated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or related risks. Kittiwakes, for example, may forage or migrate at night and are also at risk of disorientation from artificial lighting. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

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

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

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

## **TOURISM**

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

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

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

expanding segment of the local economy.

In a community with limited economic diversification, neglecting to assess tourism impacts has far-reaching consequences for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, which is a requirement under the Islands (Scotland) Act 2018.

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

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

## **SUMMARY**

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

The evidential basis for the proposal is both incomplete and unreliable. There are significant gaps in baseline data, and it relies on an undefined design envelope along with unspecified mitigation measures. Key impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism, are missing. As a result, the Environmental Impact Assessment fails to provide a complete understanding of likely significant effects or any residual impacts.

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

The proposal stands in direct opposition to National Planning Framework 4. It fails to adequately protect biodiversity, natural areas, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of any net



economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

### **Additional Comments**

why is it that out of every other place you decide to construct these farms, the one outside of Lewis has to be SO close to shore when the rest are out of sight out of mind. do it somewhere it will cause more good than harm. not here. amadains

**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: 7570E9E9

**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 marine licensing and Environmental Impact Assessment regimes. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, the proposed development exists in an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and a strong cultural identity.

The application lacks a solid evidential foundation necessary for lawful determination. There are critical gaps in environmental data, while the baseline information presented is both limited and inconsistent, leaving many key elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the mitigation measures suggested remain unspecified, rendering their effectiveness unassessable. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Moreover, the proposal presents clear and substantive conflicts with policy. It appears to be 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 fails to demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests needed for consent and undermine the authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and unfit for lawful determination. Under these circumstances, the precautionary principle must be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The application is fundamentally flawed due to its reliance on an undefined Project Design Envelope, which lacks commitment 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 Environmental Impact Assessment. As a result, the projected impacts may not accurately represent the actual development, which obstructs both public understanding and the competent authority's ability to assess the true environmental effects.

Moreover, the proposal places considerable emphasis on undefined mitigation measures, monitoring strategies, and management plans. This deferral of essential information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime. The regime mandates that likely significant effects and their mitigation be established clearly before determination, and this proposal fails to meet that requirement.

The assessment also suffers from substantial evidential deficiencies, including gaps in baseline data and methodological limitations, leading to the use of assumptions instead of site-specific evidence. This creates uncertainty surrounding the scale and significance of impacts, especially where conclusions about negligible or non-significant effects are drawn without solid 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 threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt, invoking 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 substantiated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Taken together, these factors—an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data—render the Environmental Impact Assessment Report both unreliable and incomplete. Such deficiencies obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

## **ASSESSMENT OF ALTERNATIVES**

The application does not provide a structured, evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of realistic alternatives based on environmental effects, it merely recounts the evolution of the project. This narrative approach does not demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

The lack of transparent comparison extends to offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has adequately considered placing turbines further offshore, where impacts on visual,

ecological, and coastal factors would likely be lessened. The significance of the West Lewis coastline and the critical role of proximity to the shore in assessing impact make this omission particularly concerning. Without such analysis, it is impossible to conclude that the proposed siting is the least damaging option available.

Moreover, the evaluation of cable routing and landfall is similarly flawed, with insufficient evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to establish a clear avoidance strategy and to conduct a comparative analysis indicates a lack of application of mitigation by design, leading instead to reliance on post-design measures.

Consequently, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether more suitable, less harmful alternatives are available. The absence of a robust assessment of alternatives raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies compromise adherence to the National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant omission, reinforcing the conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The proposed assessment of marine ecology and protected species exhibits significant deficiencies that undermine the reliability of its findings concerning ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the data provided is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of key species, resulting in an absence of a sound evidential basis for evaluating potential impacts.

One critical shortfall in the assessment is the failure to adequately acknowledge and evaluate the active use of coastal areas by otters, a species protected under European law, for both foraging and movement. This oversight neglects to consider their core foraging range and behavioural patterns, thus failing to assess the potential effects of construction-related disturbance, noise, and increased activity. This oversight compromises the validity of any conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic, as it introduces considerable detection bias, particularly under the conditions typical of the Atlantic.

This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent utilisation of these waters. The neglect to incorporate or properly evaluate such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects that are founded on assumptions rather than robust evidence. The lack of sufficient baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. Consequently, there is considerable uncertainty surrounding the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to satisfy the requirements outlined within the Environmental Impact Assessment regime and the National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the lawful grant of consent cannot be justified.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application presents significant deficiencies in the ornithological assessment, raising substantial concerns about its reliability. The conclusions drawn are undermined by internal inconsistencies and gaps in evidence. Notably, the west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines, yet the application fails to satisfactorily demonstrate that these species will not be adversely impacted. The proposed development is sited within critical foraging areas and migratory pathways, yet the assessment inadequately considers the potential consequences of displacement, collision risk, or habitat loss.

A significant contradiction is evident, as the developer asserts that no significant adverse effects will occur, while also advancing a Habitats Regulations derogation case, which is only warranted in situations where significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and suggests that its conclusions are not substantiated by adequate 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 importance of these feeding grounds is not thoroughly evaluated, and the reliance on modelling techniques introduces a level of uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, especially

given incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively acting as a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term impacts of sustained mortality within this corridor or the potential consequences for species that have relatively small global populations.

From a regulatory standpoint, the evidential threshold necessary to assert no adverse effect on the integrity of protected sites is not met. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, precluding a lawful conclusion that would support consent.

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

In summary, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence render it unreliable. These failings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

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

Summaries available indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, thereby eliminating speculation. Nevertheless, the failure to disclose the complete assessment limits proper scrutiny of the findings and obstructs a meaningful evaluation of their significance in the decision-making process.

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

development.

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

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and to mitigate harm; however, the evidence suggests existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a material failure within the application, breaching the evidential requirements of the Environmental Impact Assessment regime.

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of the 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 proposal lacks critical detail necessary for a thorough assessment of construction and pollution risks, rendering the evaluation of likely environmental effects materially deficient. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, despite involving substantial seabed preparation and installation works in a high-energy Atlantic environment. Instead, it relies on mitigation and contingency measures that would be prepared only after consent is granted, which prevents any meaningful assessment of their adequacy or effectiveness.

Concerns arise particularly due to the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and important habitats that could be adversely affected by 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 preventive, control, or

monitoring measures.

Uncertainty persists regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty is further exacerbated when considering potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures amplifies these issues. By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to evaluate whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and hinders the assessment of environmental protection measures at the time of decision-making.

From a regulatory standpoint, the failure to define critical environmental safeguards contradicts the Environmental Impact Assessment requirements. Significant effects and mitigation strategies must be evaluated prior to granting consent, and the absence of such information means a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainties regarding potential impacts undermines the integrity of the assessment, further supporting the conclusion that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The proposal fails to provide a thorough evaluation of the ecological and socio-economic impacts on fisheries and marine life, despite the waters off the West Lewis coast hosting both a vibrant marine ecosystem and a significant fishing industry. The application does not convincingly demonstrate how these critical uses and habitats will be preserved without substantial disruption.

A major concern is the assumption that fishing activity can be relocated without consequences. There is no evidence presented that alternative fishing grounds are available, accessible, or suitable to accommodate increased pressure. This lack of information is critical, as such displacement poses a risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, understanding the implications for fisheries and local livelihoods becomes impossible.

The application also introduces considerable risks to marine species due to the anticipated underwater noise from construction activities. The use of high-energy hammer piling over an extended timeframe is expected to cause disturbances that reach large distances, thereby impacting species like dolphins. Concerns arise from

the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application diminishes the importance of these effects and does so without adequate supporting evidence.

There exists a notable contradiction within the application, where the need for licenses to permit harm to European Protected Species is recognised while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, especially when harm is anticipated at a level that necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these collective effects is essential, as it directly influences our ability to gauge 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 show that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any assertion that the proposal constitutes sustainable development.

In conclusion, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the effects on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The application fails to provide a thorough assessment of the onshore infrastructure, which is essential for understanding the full impacts of what is a single integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic effects.

Onshore elements consist of cabling that crosses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive impact assessment for these onshore elements prevents a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the division between

offshore and onshore assessments means that the combined impacts on peatlands, habitats, and communities remain unclear.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This indicates a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance are also raised by the proposal. Disturbing peatland can release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy initiatives. The application falls short in adequately addressing this concern or in demonstrating that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been undertaken, prompting questions about deliverability and lawful implementation.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

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

The Environmental Impact Assessment is notably lacking in its evaluation of the effects this lighting will have on visual amenity, landscape character, and the experiences of both residents and visitors. The significance of dark skies to the region's identity, particularly in light of emerging tourism sectors such as astro-tourism, makes this omission even more critical. Without addressing the potential impacts of the proposed lighting, there exists a clear gap in the overall assessment of landscape and environmental factors.

Furthermore, there is no analysis of the potential effects on nocturnal wildlife, with key species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel being highly sensitive to artificial lighting. These species experience disorientation due

to phototaxis, which may increase the risk of collisions. The application fails to include any impact assessment regarding lighting or a study on phototaxis, thereby neglecting to evaluate how the proposed aviation lighting could affect these birds or lead to increased mortality.

The ornithological assessment relies on daytime survey data, which fails to capture nocturnal activity or the associated risks that nocturnal species face. Birds such as Kittiwakes, which may forage or migrate at night, could also be disoriented by artificial lighting, but this risk has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

The absence of an assessment concerning nocturnal impacts makes it impossible to determine whether protected species or designated sites may be adversely affected. The necessary evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and precludes a lawful determination.

From a policy standpoint, this omission stands in conflict with National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It also compromises the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall environment.

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

## **TOURISM**

The application presents a significant shortfall in the assessment of tourism impacts, neglecting to examine the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the potential industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or broader economic resilience. This absence of analysis precludes a determination of whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment overlooks the significance of environmental quality in

tourism, particularly the need for unspoiled landscapes and dark skies for an enhanced visitor experience. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a major gap in understanding the effects on a recognised and growing segment of the local economy, namely nature-based tourism and astro-tourism.

In an island community with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives identifying tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic reliance result in a considerable evidential void. This gap hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application remains incomplete.

## **SUMMARY**

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and evidential benchmarks. This application mirrors the core issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Presenting this proposal under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify its inherent flaws.

There is a lack of a complete and reliable evidential basis for determination in the application. Critical gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the omission of significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, further compromise the application. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the omission of the complete Social Impact Assessment represents a substantial gap in the information provided. These deficiencies prevent the competent authority from adequately assessing the impacts

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

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

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in several areas. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

When considered collectively, these procedural and substantive deficiencies render the application unfit for determination. The considerable information gaps, policy conflicts, and unresolved environmental risks prevent a lawful, evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information.

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

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B635FE2C



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

**Dear Sir/Madam**

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies related to planning, environmental concerns, cultural impacts, and procedural integrity. The proposed site is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and deep cultural roots. The scale and design of this project raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide a sufficient evidential foundation for a lawful decision. There are critical gaps in environmental data, while baseline information is both limited and inconsistent, leaving essential components of the proposal inadequately defined. The flexible design framework employed hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the provided documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and claims regarding negligible or non-significant effects lack robust evidential support.

Substantial conflicts with policy are evident. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national mandates to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory criteria necessary for consent and compromise the competent authority's ability to determine the development's policy acceptability.

The magnitude of this proposal is unprecedented for the area, with large turbines situated in close proximity to the shore, raising considerable concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is incomplete and fails to deliver a full, transparent, or dependable account of the potential environmental effects of the proposal. The flexible Project Design Envelope used lacks commitment to specific turbine dimensions, layouts, or configurations, introducing significant uncertainty. This flexibility obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that have not yet been defined. This approach prevents any meaningful evaluation of effectiveness or assessment of residual impacts, as it relies on the notion that environmental harm will be addressed at a later stage. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly before determination.

The report also shows significant evidential deficiencies, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of impacts, especially where conclusions regarding negligible or non-significant effects are drawn. The insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

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

## **ASSESSMENT OF ALTERNATIVES**

The application fails to adequately assess alternatives in accordance with the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on environmental impacts, it presents a narrative of project evolution. This approach does not demonstrate that less harmful options have been identified, assessed, and preferred

over more damaging solutions.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in determining impact makes the absence of this analysis significant, preventing any determination that the proposed siting is the least damaging option.

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

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

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that contributes to the overall finding that the application has not been sufficiently evaluated and cannot support a lawful decision.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species 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.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The ornithological assessment presents significant deficiencies, characterised by substantial gaps in evidence and contradictions that undermine its validity. The application does not demonstrate, to the requisite evidential standard, that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline, will not suffer adverse effects. The proposed development is situated within crucial foraging areas and migratory routes, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental inconsistency within the application itself. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment and suggests that its conclusions lack proper substantiation from the underlying evidence. Additionally, the assessment does not sufficiently establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain

unaffected. It does not fully take into account the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor further compounds these risks, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and the potential impact on species with relatively small global populations have not been adequately assessed.

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

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

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of impacts and culminate in the conclusion that the application does not fulfil the statutory requirements essential for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of the cultural heritage and community identity associated with the West Lewis coastline is insufficient and does not acknowledge this area as a living cultural landscape, where the environment, language, tradition, and community are intertwined. Instead of recognising the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive stance, treating these elements as mere isolated and static assets.

Particularly concerning is the handling of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment inaccurately categorises them as static features, neglecting their active use, significance, and the potential impact of development on their settings. This misrepresentation leads to an incomplete understanding of the cultural effects and overlooks their importance in community life.

The application also fails to consider intangible cultural heritage, such as the Gaelic language and traditions, as well as the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the assessment, representing a substantial oversight. Without acknowledging these factors, it is impossible to grasp the true cultural impact of the proposed development.

Concerns regarding community rights and engagement further exacerbate the situation. The Gaelic-speaking population has a unique cultural identity recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement diminishes the legitimacy of the assessment and does not adhere to established principles for involving communities in decisions that affect their cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. The failure to conduct this assessment hinders the competent authority's ability to fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone calls into question the legality of the determination process.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to account for both tangible and intangible heritage, alongside the disregard for living cultural practices, clearly deviates from policy requirements.

Overall, the combined failure to address 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 assessed, resulting in an application that fails to provide a sound basis for understanding the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency denies both the public and the competent authority the ability to fully comprehend the social risks identified through the developer's own research. Available summaries highlight that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative, yet the failure to disclose the complete assessment hinders proper scrutiny and limits understanding of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is seen as a direct threat to community identity and cohesion. The developer's findings identify "cultural loss," but these impacts have not been adequately integrated into the main application or given

appropriate consideration. This withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

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

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

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

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of visual impacts, seascape, and landscape is significantly flawed and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and an undeveloped character, contributing to a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately convey the magnitude 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 would directly affect visual amenity and undermine the naturalness and remoteness that define the area. The assessment does not accurately reflect this level of impact or its significance within such a sensitive landscape.

There are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding



key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may be understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of evaluation regarding the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships with the Atlantic horizon. The assessment treats these as isolated features, failing to acknowledge their interdependence, which leads to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and 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 in 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 requirements to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any claims of policy compliance.

It is also 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. The resulting change is fundamental and permanent, unable to 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 reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment regarding construction and pollution risks is fundamentally lacking, failing to provide the necessary detail to evaluate the potential environmental impacts adequately. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that would only be developed after consent, which precludes any thorough evaluation of their effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and

contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not offer adequate detail on how these issues will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether suitable safeguards are in place to respond to pollution incidents. This approach introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant likely effects and mitigations must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The proposal presents significant inadequacies in the assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters surrounding the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry. However, the application does not adequately prove that these vital habitats and uses can be preserved without considerable disruption.

A major concern lies in the assumption that fishing activities can be relocated without adverse effects. The application lacks evidence to indicate that alternative fishing grounds exist, are accessible, or can endure increased pressure. This gap is crucial, as displacing fishing can lead to overfishing in other areas and could have broader economic ramifications for the local fishing community. In the absence of a well-founded assessment, the potential consequences for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during the construction phase. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across considerable distances, impacting species such as dolphins. Concerns regarding the predicted disturbance to a substantial portion of the local bottlenose dolphin population are serious, yet the application downplays these impacts, lacking adequate supporting evidence.

There is also a troubling inconsistency within the application itself; while it acknowledges the necessity for licences to inflict harm on European Protected Species, it simultaneously describes the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions about its adherence to the Habitats Regulations, especially where anticipated harm would require legal authorisation.

Furthermore, the assessment neglects to account for cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which hinders any conclusion about the proposal's sustainability.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The application for the proposed project, which includes offshore turbines and onshore works, presents significant deficiencies in its assessment of onshore infrastructure. The onshore elements consist of cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure that traverses sensitive landscapes. These works involve excavation in deep peat areas, particularly within Barvas Moor, a critical carbon store and ecologically sensitive habitat. The incomplete assessment of these impacts leads to an insufficient understanding of the project's overall environmental footprint.

A fundamental issue is the separation of offshore and onshore components, which results in a fragmented evaluation that fails to consider the cumulative effects of the entire project. The Environmental Impact Assessment process necessitates that all parts of a project are assessed collectively. By neglecting to evaluate the combined impacts on peatlands, habitats, and local communities, the application precludes a thorough understanding of the associated risks and challenges.

Additionally, the potential impacts on sensitive habitats, including machair systems and peatland environments, are not adequately addressed. The application does not provide sufficient evidence that these habitats have been fully assessed or that appropriate measures to avoid detrimental effects have been implemented, leaving a notable gap in the evidence concerning biodiversity protection. Furthermore, the proposed routing of infrastructure through active croft land raises concerns about conflicts with existing land use and legal rights, as there is no indication that the necessary consents or processes have been initiated.

From a policy standpoint, the fragmented assessment of the project undermines compliance with the National Marine Plan and National Planning Framework 4. The failure to demonstrate the protection of peatlands, habitats, and land use interests, coupled with the inability to show that impacts can be avoided or mitigated, further jeopardises the application. Collectively, these issues render the application incomplete and unreliable, preventing a lawful determination of the project's viability.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The proposal significantly neglects the assessment of dark skies and nocturnal wildlife, which represents a substantial shortcoming in the Environmental Impact Assessment. The West Lewis coastline is known for its remarkably dark skies, which are vital to the environmental quality, cultural identity, and tourism potential of the region. However, the introduction of permanent red aviation lighting, visible over extensive distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given the role of dark skies in shaping the area's identity and the emergence of tourism sectors such as astro-tourism. As a result, there exists a clear gap in the overall assessment of landscape and environmental factors.

Of even greater concern is the absence of evaluation regarding impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, leading to disorientation and increased collision risk. The application does not contain any lighting impact assessment or phototaxis study, thus failing to consider how aviation lighting might affect these species or potentially increase their mortality rates.

This lack of nocturnal assessment is further exacerbated by the reliance on daytime survey data within the ornithological evaluation, which overlooks nocturnal activity and associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting; however, this has not been adequately assessed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions are in direct conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, they compromise the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an integral component of the overall ecological setting.

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

## **TOURISM**

The application for the proposed development presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences on a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and overall sense of remoteness. Although the application notes that 86% of visitors are motivated by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism in the area has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, and currently supports more than 1,000 jobs, comprising up to 16% of the island's economy. Nevertheless, the application does not explore how the anticipated industrialisation of the seascape and a decline in environmental quality may affect Tourism Gross Value Added or broader economic resilience. This lack of analysis inhibits the ability to ascertain whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the application fails to adequately consider the significance of environmental quality in fostering tourism. This includes the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the rising demand for nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment only exacerbates this shortcoming, resulting in a critical gap in understanding the potential impacts on this recognised and growing segment of the local economy.

For an island community with limited economic diversification, the insufficient evaluation of tourism impacts bears broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities

Impact Assessment means that these economic vulnerabilities remain unexamined, 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 need to illustrate net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Collectively, these shortcomings—including the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependency of the island—culminate in a significant evidential gap. This gap hampers a thorough assessment of economic effects and leads to the conclusion that the application remains incomplete.

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable deficiencies in the evidential basis required for determination. The application is marred by critical gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address significant impact pathways, particularly concerning nocturnal wildlife, the entirety of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or any residual impacts.

Procedural failures are also evident in the application. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The impacts on health and wellbeing are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from offshore and onshore elements has not been adequately conducted, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain both uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The required evidential threshold to confirm that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

**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: 71D7B633



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

**Dear Sir/Madam**

This letter constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. There are significant concerns about the scale, proximity, and design of the proposal in relation to its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful determination. There is a lack of critical environmental data, and the baseline information presented is limited and inconsistent. Key aspects of the proposal remain undefined, and the flexible design framework employed prevents a clear understanding of potential significant effects. Furthermore, reliance on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to offer a comprehensive or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national requirements to safeguard biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly undermine the statutory tests required for consent and compromise the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly with large turbines positioned in close proximity to the shoreline. 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. Under these circumstances, the precautionary principle must be applied.

**MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species is fundamentally flawed, failing to provide a comprehensive and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region is known for its sensitivity

and biological activity, yet the existing baseline data is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat usage of local species. Consequently, the assessment lacks a credible evidential basis for evaluating potential impacts.

A significant oversight in this assessment concerns otters, which are recognised as a European Protected Species. The application does not adequately identify or evaluate their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts of construction disturbances, noise, and increased human activity. As a result, the conclusions drawn regarding the absence of significant effects on this species are compromised.

Further issues are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces a notable detection bias, particularly in the challenging conditions of the Atlantic. This methodology is prone to underestimating their presence, especially in light of established land-based observations that demonstrate frequent usage of these waters. The failure to integrate or give due consideration to this vital data results in a flawed baseline, undermining the reliability of the conclusions reached.

The aforementioned methodological deficiencies lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This gap in understanding introduces uncertainty regarding the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to fulfil the criteria set out in the Environmental Impact Assessment framework and the National Planning Framework 4, as it does not properly identify or assess protected species. The level of uncertainty generated by these omissions precludes the ability to dismiss adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, it is clear that consent cannot be granted lawfully.

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

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment fails to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. It adopts a simplistic view of heritage, treating it as a collection of isolated, static features rather than acknowledging their ongoing social, cultural, and

spiritual significance within the community. This reductive approach undermines the true nature of these assets.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated inadequately. These sites remain 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 consider how development impacts their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Moreover, the application neglects to assess intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These vital elements form the identity of the area but are absent from the assessment, highlighting a significant omission. Without addressing these factors, the cultural impact of the proposed development cannot be fully understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity with characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to align with established principles of participation regarding cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to meet its legal obligations in evaluating the social, cultural, and economic impacts on the island community. The lack of this assessment alone hinders a lawful determination.

From a policy standpoint, these deficiencies create a direct conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to recognise living cultural practices illustrates a clear departure from policy requirements.

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for assessing the true cultural cost of the proposal.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment concerning visual, landscape, and seascape impacts is significantly inadequate and does not fully capture the extent of change or the sensitivity of the affected environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The

proposed installation of large-scale turbines near the shoreline would result in a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to sufficiently convey the magnitude of this visual transformation. The size and closeness of the turbines would overpower views from residential areas, historic sites, and popular coastal locations. This situation would directly diminish visual amenity and compromise the defining qualities of naturalness and remoteness. The assessment does not adequately express the significance of these impacts within such a sensitive landscape context.

Concerns also arise from the methodology applied 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 concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, thus questioning the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities fails to acknowledge their interdependence, leading to an incomplete understanding of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the preservation of natural spaces and historic assets. The extent of 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 assessment further weakens any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Consequently, the change is fundamentally permanent and cannot be reduced 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 intertwined nature of landscape and heritage. These shortcomings impede a reliable evaluation and reinforce the conclusion that the proposal does not align 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 waters off the West Lewis coast support a diverse marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life related to the proposal is inadequate, failing to provide a solid evaluation of the ecological and

socio-economic impacts. The application does not establish that these vital uses and habitats can be protected or maintained without significant disruption.

A critical concern is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or able to sustain additional pressure. This significant oversight raises the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. Extended high-energy hammer piling is expected to cause disturbances across large distances, affecting species such as dolphins. The anticipated disruption to a substantial portion of the local bottlenose dolphin population is alarming, yet the application minimises the severity of these impacts, lacking adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged even while impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment does not adequately address cumulative impacts from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the project's onshore infrastructure is incomplete and fails to address the full range of impacts from what constitutes a single integrated project. While the offshore turbines and onshore works are inherently connected, they are assessed separately. This fragmented approach obscures the true extent of environmental and socio-economic effects.

Included in the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. The proposed works involve excavating areas of deep peat, particularly in Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application does not include a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application obstructs a proper 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 means that the combined impacts on peatlands, habitats, and communities are not fully appreciated.

There are serious risks to sensitive habitats, such as machair systems and peatland environments, which have policy protection. The application fails to show that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been implemented. This highlights a significant gap in terms of biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbing peatland releases stored carbon, which could create a carbon debt that runs counter to the aims of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance is beneficial.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or procedures have been started, leading to questions about its deliverability and lawful execution.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The 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 of the tourism impacts related to this application is significantly lacking. It does not adequately evaluate the economic and social effects on a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and the sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it does not

provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Tourism has seen considerable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model how the potential industrialisation of the seascape and loss of environmental quality could affect Tourism Gross Value Added and broader economic resilience. Without this analysis, it is unclear whether the development would result in a net economic benefit or harm a vital and growing sector.

Moreover, the assessment neglects to consider how environmental quality underpins tourism, including the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a substantial gap in understanding the impacts on an acknowledged and expanding part of the local economy.

In an island community with limited economic diversification, the oversight regarding 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 required under the Islands (Scotland) Act 2018.

From a policy viewpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, providing insufficient evidence for the competent authority to assess the economic ramifications of the proposal.

All these factors combined lead to a significant evidential gap due to the failure to quantify tourism impacts, evaluate environmental influences on visitor behaviour, and consider the island's economic dependency. This results in an inadequate 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 represents a significant failure to meet the criteria for sustainable development as mandated by statutory obligations, national policies, and evidential standards. This application mirrors the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these critical areas.

A thorough evaluation reveals that the application lacks a complete and reliable

evidential basis for determination. There are substantial gaps in baseline data, an undefined design envelope is still in use, and the proposed mitigation measures remain unspecified. Additionally, important impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, inhibiting a full understanding of the likely significant effects or residual impacts.

Procedurally, the proposal exhibits clear shortcomings. The absence of a compliant Island Communities Impact Assessment signifies a breach of statutory duty as per the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a comprehensive Social Impact Assessment constitutes a material omission. These inadequacies hinder the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

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

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

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

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

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

### **Additional Comments**

The scale of the proposed development is unprecedented in this region. The introduction of extremely large wind turbines into what is currently an open and largely undisturbed seascape will fundamentally alter the natural character of the coastline. This is not a marginal change; it is an industrialisation of a marine environment that has, until now, remained relatively intact. The visual impact alone will be profound, with turbines dominating views from land and sea, permanently transforming the relationship between the community and its coastal surroundings.

Environmentally, the project poses serious risks to marine ecosystems and bird populations. The construction and operation of turbines of this magnitude will introduce sustained noise, vibration, and physical disturbance into habitats that support a wide range of species. Migratory birds, seabirds, and marine mammals are particularly vulnerable, with increased risks of displacement, habitat fragmentation, and collision. These are not speculative concerns but well-documented consequences of large-scale offshore wind developments.

Equally important is the cultural significance of the seascape. For generations, this coastal environment has shaped local identity, heritage, and way of life. It holds historical, social, and, in many cases, spiritual value for the community. The uninterrupted horizon, the sense of openness, and the connection to the natural marine environment are integral to that cultural fabric. The proposed turbines would impose a stark and industrial presence that erodes this heritage, replacing a living landscape with one defined by infrastructure.

Crucially, the development offers no meaningful or tangible benefits to local residents that would offset these impacts. There is no clear evidence that the community will experience improved livelihoods, reduced energy costs, or enhanced local infrastructure as a result of this project. Instead, the burden of environmental degradation and cultural loss falls disproportionately on those who live closest to the site.

In summary, the Spiorad na Mara Offshore Wind Farm represents a significant and unjustified intrusion into a sensitive environmental and cultural landscape. The scale of the turbines, combined with the absence of local benefits, makes this development unacceptable.

**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: 23BC099B

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

**Dear Sir/Madam**

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and rich cultural identity. Concerns arise from the scale, proximity, and design of the wind farm, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain undefined, which hinders a clear understanding of its likely significant effects. The use of a flexible design framework complicates the assessment further, while the unspecified reliance on mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. 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 aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and weaken the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The 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, it is essential to invoke the precautionary principle.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report presents significant deficiencies, leading to an unreliable account of the likely environmental effects associated with the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which

lacks specific turbine dimensions, layouts, or configurations. This creates uncertainty and hinders the assessment of a worst-case scenario. Consequently, the integrity of the evaluation is compromised, making it difficult for the public and the competent authority to comprehend the true environmental impacts.

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

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

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

In conclusion, the combination of reliance on an undefined design envelope, absence of defined mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These shortcomings prevent a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The proposal fails to provide a transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. In particular, there is no indication that the developer has thoroughly considered placing turbines further offshore, where impacts on visual aesthetics, ecology, and coastal areas would likely be diminished. The sensitivity of the West Lewis coastline, along with the significant role that proximity to shore plays in determining environmental impact, underscores the importance of this analysis. Its absence raises doubts about whether the proposed siting is indeed the least damaging option available.

Moreover, the assessment of alternatives is materially inadequate and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives grounded in environmental effects, the application merely recounts the evolution of the project. This narrative fails to prove that less harmful options have been properly identified and assessed in preference to more damaging solutions.

Deficiencies are also evident in the evaluation of cable routing and landfall assessment. There is inadequate evidence demonstrating that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been applied; rather, reliance has been placed on post-design mitigation measures.

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

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, 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 West Lewis coastal environment represents a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. The methodologies applied do not provide a complete or reliable understanding of ecological receptors within this area, with baseline data being notably incomplete. This inadequacy hampers the assessment's ability to capture essential aspects of species presence, behaviour, and habitat use, leading to a lack of sound evidential basis for evaluating potential impacts.

A critical oversight in the application is the failure to adequately recognise and assess the active use of coastal areas by otters, which are classified as a European Protected Species. The assessment neglects to consider their core foraging range and behavioural patterns, meaning that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. Consequently, the validity of conclusions regarding the absence of significant effects on this species is undermined.

Furthermore, there are notable deficiencies in the assessment of basking sharks due to



the heavy reliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of these animals, especially when compared to established land-based observations indicating their frequent use of these waters. The failure to incorporate or adequately consider such pertinent data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based on assumptions rather than substantial evidence. Additionally, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This scenario creates uncertainty regarding the true level of risk posed to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. Such deficiencies preclude a rigorous evaluation of impacts on marine ecology and protected species, further substantiating the conclusion that the application is devoid of a sufficient evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the application regarding seabird populations is fundamentally flawed, containing significant gaps and inconsistencies that challenge its validity. It is situated on the west coast of the Isle of Lewis, an area known for its internationally important seabird populations, which are already experiencing declines. The application fails to adequately demonstrate that these species will not be negatively impacted. Notably, the development is within critical foraging areas and migratory pathways, yet the assessment lacks a thorough evaluation of potential displacement, collision risk, and habitat loss.

A key contradiction exists within the application, as the developer claims there are no significant adverse effects while also submitting a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by solid evidence. The assessment does not sufficiently prove that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling introduces uncertainty, especially for declining species such as Kittiwakes and Fulmars. The methods used are likely to underestimate

mortality, particularly due to incomplete baseline data and a lack of understanding regarding behavioural responses.

The placement of turbines in a recognised migratory corridor poses a considerable risk by acting as a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of increased mortality within this corridor or the potential impact on species with small global populations. From a regulatory viewpoint, the application does not satisfy the evidential threshold needed to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data deficiencies and modelling issues, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, making a lawful conclusion in support of consent impossible.

The identified deficiencies also breach the requirements of the National Planning Framework 4 regarding biodiversity protection and the conservation of natural assets. The failure to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to internal contradictions, methodological flaws, and inadequate evidence, which hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory criteria needed for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The West Lewis coastline is a living cultural landscape where the environment, language, tradition, and community are interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach that treats heritage as a series of isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual functions within the community.

Significant deficiencies arise in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These active places of burial and spiritual practice have been categorised as static features, which neglects their continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their importance within community life.

Furthermore, the assessment does not address intangible cultural heritage, including the Gaelic language and traditions, as well as the long-standing relationship between the community and the coastal environment. These elements are central to the area's identity yet are completely absent from the assessment, marking a significant omission. Without considering these factors, the cultural impact of the development cannot be accurately understood.

Concerns extend to community rights and engagement. The Gaelic-speaking

population possesses a distinct cultural identity recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect the established principles of participation in decisions impacting cultural and environmental interests.

Another critical procedural failure 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 cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination.

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

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to 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 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 assessment related to seascape, landscape, and visual impacts is insufficient and does not capture the true scale of change or the vulnerability of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a persistent industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately conveys the extent of this visual alteration. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal spots. This would negatively affect visual amenity and detract from the essential qualities of naturalness and remoteness. The assessment does not accurately depict this level of impact or its significance within such a delicate landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence that these viewpoints do not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact's magnitude has been downplayed, compromising the assessment's reliability.

Another shortcoming is the lack of consideration for the interconnected relationship

between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as separate entities, failing to acknowledge their interdependence and resulting in an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact but also a wider cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is at odds with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertions of policy compliance.

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

In conclusion, the assessment fails to accurately reflect the impact scale, the environment's sensitivity, 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 includes extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent, which hampers any meaningful assessment of their sufficiency or effectiveness. This approach raises significant concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

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

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information precludes a lawful determination. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The assessment of marine life and fisheries in the application is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The West Lewis coast is home to a vibrant marine ecosystem and an active fishing industry. However, the proposal does not adequately demonstrate how these essential habitats and industries can be safeguarded from significant disruption.

A critical concern is the assumption that fishing activities can simply be relocated without negative consequences. The application lacks evidence supporting the availability, accessibility, and capacity of alternative fishing grounds to absorb any increased pressure. This absence of information is notable, as displacement could lead to overfishing in other areas and result in broader economic ramifications for the local fishing fleet. Without a solid and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, impacting species such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction diminishes

the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts that may arise from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these collective effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

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

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

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

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



gap concerning biodiversity protection.

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

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

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

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

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

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

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of

disorientation from artificial lighting; however, this vulnerability has not been examined. Without site-specific night-time data, there exists a significant deficiency in understanding the ecological impacts of the proposal.

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

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

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

## **TOURISM**

The evaluation of the tourism impacts associated with this application is significantly lacking, particularly regarding the economic and social repercussions for a vital part of the Isle of Lewis economy. The local tourism industry relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the potential consequences of seascape industrialisation and environmental degradation on Tourism Gross Value Added and the resilience of the wider economy. Without this critical analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging sectors such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding how the proposal may impact a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the neglect of tourism

impact assessments poses broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly examined, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity to demonstrate net benefit. It also stands in conflict with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Collectively, the inability to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and acknowledge the island's economic dependencies results in a significant evidential gap. This undermines 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 requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that caused the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable in terms of the scale of industrialisation. This current application is presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

The application lacks a complete and reliable evidential basis for decision-making. There are significant gaps in baseline data, it utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it fails to address key impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. As a result, the Environmental Impact Assessment is incomplete, inhibiting a full understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, not disclosing the full Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks remain unclear and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, preventing a lawful conclusion that the impacts are acceptable.

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

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

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

### **Additional Comments**

As someone that works and relies on Tourism for employment the construction of this massive windfarm will have a unreversable impact on the Islands. They will become an industrialised desert leading to mass depopulation of Lewis and the death of Tourism.

**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: 3C2AD959

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

**Dear Sir/Madam**

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

A thorough review of the Environmental Impact Assessment Report and supporting documentation reveals that the application does not provide an adequate evidential basis for a lawful determination. There are critical gaps in environmental data, and the baseline information is both limited and inconsistent. Moreover, many key aspects of the proposal remain undefined. The flexible design framework employed by the developers hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents a proper assessment of their effectiveness. Consequently, the documentation does not offer a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial policy conflicts inherent in the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, introduces serious concerns about landscape capacity, visual dominance, and overall environmental impact. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is apparent that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be invoked.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report lacks the necessary transparency and reliability needed to fully account for the potential environmental effects of the

proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, results in considerable uncertainty. This uncertainty compromises the integrity of the assessment, meaning that the impacts detailed may not accurately represent the development that will ultimately be constructed. As a result, both the public and the competent authority are unable to grasp the true extent of the environmental effects.

The application relies on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the understanding that environmental harm will be addressed later prevents a proper evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to stages after consent is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before a determination is made.

Moreover, there are considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions in lieu of site-specific evidence. Such issues result in uncertainty surrounding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal also fails to comply with the National Planning Framework 4, especially in terms of biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that proper safeguards are established.

In summary, the dependence 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 evaluation of environmental effects, preventing the competent authority from making a well-informed determination based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The application lacks a thorough assessment of alternatives, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. It does not offer a structured, reasoned comparison of realistic alternatives based on their environmental effects. Instead, it presents a narrative regarding the project's development, which does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is no evidence-based or transparent comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline, the lack of such analysis obstructs any conclusion that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy, coupled with the lack of comparative analysis, illustrates that mitigation by design has not been implemented. Instead, reliance appears to be placed solely on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies compromise 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 represents a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot sustain a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The evaluation of marine ecology and protected species is fundamentally flawed, leading to an inadequate understanding of the ecological receptors within the West Lewis coastal environment. This region is a sensitive and biologically vibrant marine system, yet the baseline data provided is incomplete. The methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation necessary for assessing potential impacts.

One significant oversight in this evaluation is the failure to properly acknowledge otters, a European Protected Species, and their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in a lack of adequate assessment regarding the effects of construction disturbance, noise, and increased activity. This deficiency undermines any conclusions regarding the lack of significant effects on this species.



In addition, the assessment of basking sharks suffers from reliance on aerial surveys that create a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to land-based observations that indicate frequent use of these waters. The failure to integrate or properly consider such crucial data results in a flawed baseline and diminishes the reliability of the conclusions drawn.

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

Regulatory requirements are not met, as the application fails to accurately identify or assess protected species, contravening the principles of the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these circumstances, consent cannot be granted lawfully.

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, leading to the conclusion that the application lacks a sufficient evidential basis.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The proposed development raises significant concerns regarding its impact on the environment, particularly in relation to internationally important seabird populations on the west coast of the Isle of Lewis. The application does not sufficiently demonstrate that these species, many of which are already declining, will not be adversely affected. Located within key foraging areas and migratory pathways, the site poses risks that the ornithological assessment fails to adequately address, such as displacement, collision risk, and habitat loss.

Moreover, there exists a fundamental contradiction within the application itself. The developer asserts that there will be no significant adverse effects while also advancing a case for Habitats Regulations derogation, a measure only necessitated when significant harm is anticipated. This inconsistency undermines the reliability of the assessment, casting doubt on its conclusions which are not supported by robust underlying evidence.

The assessment particularly lacks sufficient evidence regarding the effects on seabirds associated with protected sites like the Lewis Peatlands and St Kilda. The critical feeding grounds for these species are inadequately acknowledged, and the modelling approaches used introduce a level of uncertainty, especially for species that are in severe decline, such as Kittiwakes and Fulmars. Methodologies applied in the

assessment are likely to underestimate potential mortality, particularly given the incomplete baseline data and insufficient understanding of behavioural responses.

Additionally, placing turbines within a recognised migratory corridor poses an elevated risk, creating barriers in the primary flight path of species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term consequences of increased mortality within this corridor or the potential effects on species with relatively small global populations.

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

Ultimately, the identified deficiencies illustrate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal directly in conflict with national policy.

In conclusion, the assessment is fundamentally flawed due to its internal inconsistencies, methodological weaknesses, and lack of adequate evidence. These deficiencies hinder a comprehensive evaluation of the potential impacts and support the overall finding that the application does not fulfil the statutory requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The inadequacy of the assessment regarding cultural heritage and community identity is glaring, as it does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of understanding heritage as an evolving part of community life, the application adopts a simplistic view, reducing it to isolated, static assets.

A significant oversight is apparent in the treatment of sites of cultural importance, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet they are incorrectly categorised as mere static features. This mischaracterisation neglects their ongoing significance and the implications of development on their surroundings, leading to an incomplete assessment of cultural effects and overlooking their vital role in community life.

Equally troubling is the failure to consider intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the local community and the coastal environment. These aspects are fundamental to the area's identity but have been disregarded in the assessment, marking a substantial omission that prevents a comprehensive understanding of the development's cultural impact.

Concerns regarding community rights and engagement further complicate the situation. The Gaelic-speaking population embodies a unique cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement casts doubt on the legitimacy of the assessment and contravenes established principles of participation in matters affecting cultural and environmental interests.

Moreover, a critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, a statutory requirement mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligation to assess the social, cultural, and economic ramifications on the island community, resulting in a significant legal gap.

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

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently evaluated, leaving the application lacking a robust foundation for assessing the true cultural costs involved.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The assessment regarding social impacts, health, and wellbeing associated with the proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made publicly available. This absence represents a substantial evidential gap that inhibits both public understanding and the competent authority's ability to ascertain the full range of social risks identified in the developer's research.

Residents have expressed measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development, as evidenced by direct engagement with the community. However, the lack of access to the full assessment hampers proper scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process. Furthermore, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings highlighting a potential "cultural loss." Notably, these impacts have not been adequately addressed within the main application, nor have they been assigned appropriate weight, thereby obscuring the genuine human and social costs associated with the development.

The absence of transparency fundamentally undermines the Environmental Impact

Assessment process. A comprehensive understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functionality may be jeopardised. By failing to provide the complete dataset, the application lacks a thorough evidential basis necessary for weighing the benefits against the potential harms.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 concerning health and wellbeing. Development must not only support positive health outcomes but also mitigate harm. The evidence currently available indicates existing adverse effects that have not been fully disclosed, rendering it impossible to demonstrate compliance with this policy without the full assessment.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This deficiency obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The proposed application involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This development would create a dominant industrial presence that would fundamentally alter the existing landscape, resulting in a permanent and irreversible transformation.

The assessment conducted fails to adequately represent the magnitude of the visual change that would occur. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The report does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that 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 visual impact has been underestimated, compromising the assessment's reliability.

Additionally, there is a notable deficiency in addressing the interconnected relationship

between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape and are visually and spatially linked to the Atlantic horizon. However, the assessment treats these sites as isolated, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This not only represents a visual impact but also signifies broader cultural and spatial harm, which has not been sufficiently addressed in the application.

From a policy standpoint, this proposal contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The absence 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. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Consequently, the changes resulting from this development would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately represents 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 current proposal presents significant deficiencies in its assessment of construction and pollution risks, failing to deliver the necessary detail to evaluate potential environmental impacts. Notably, there is a lack of fully developed Construction Environmental Management Plans or Pollution Prevention Plans, despite the substantial seabed preparation and installation works required in the high-energy Atlantic environment. The application relies on mitigation and contingency measures that will only be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures is particularly alarming, given the sensitivity of the receiving environment along the West Lewis coastline. This area is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these threats.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies renders it 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 identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures, which raises further concerns. By postponing contingency planning to a post-consent stage, the application inhibits the assessment of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and undermines the capability of the competent authority to evaluate environmental protection measures during the determination phase.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent, and the absence of such information means a lawful determination cannot occur. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The assessment regarding fisheries and marine life lacks thoroughness and does not adequately evaluate ecological or socio-economic impacts. The fishing industry is active off the West Lewis coast, which is home to a diverse marine ecosystem. However, the application does not prove that these habitats and uses can be safeguarded or sustained without significant disruption.

A major concern is the assumption that fishing activities can be moved without consequences. The application fails to provide evidence that alternative fishing grounds are available and accessible, or that they can handle additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas and might have broader economic repercussions for the local fishing fleet. The consequences for fisheries and livelihoods cannot be comprehensively understood without a clear and evidence-based assessment.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across considerable distances, impacting species such as dolphins. The potential disturbance to a notable portion of

the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without sufficient evidence to support such claims.

There is also a notable inconsistency in the application, as it acknowledges the need for licenses to allow harm to European Protected Species, while simultaneously stating that the impacts are negligible. This contradiction weakens the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is necessary 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 the proposal constitutes sustainable development.

In summary, the insufficiency of evidence regarding fishing displacement, the minimization of acoustic impacts, and the internal contradictions indicate that the assessment is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

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

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

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



understood.

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

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not provide evidence that the required consents or processes have been initiated, raising serious concerns about deliverability and lawful implementation.

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The coastline of West Lewis is noted for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and potential for tourism, particularly in developing sectors like astro-tourism. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive wall of light across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Such an oversight is particularly concerning given the critical role that dark skies play in the area's identity. Furthermore, there is a lack of assessment regarding the effects on nocturnal wildlife, including species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are sensitive to artificial lighting. This can cause disorientation and heighten collision risks. The application does not contain a lighting impact assessment or a phototaxis study, failing to examine how the proposed aviation lighting might impact these species or contribute to increased mortality rates.

The situation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed.

The lack of site-specific night-time data results in a crucial void in understanding the ecological impacts.

Without a proper evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, necessitating the application of the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the safeguarding of natural areas and the maintenance of environmental quality. It further diminishes the overall appraisal of landscape and seascape impacts, as the character of night-time settings is a fundamental aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife results in a considerable evidential gap. The lack of baseline data, impact modelling, and specific analysis of species means the application is incomplete and cannot support a lawful determination.

## **TOURISM**

The evaluation of tourism impacts is critically inadequate, neglecting to assess the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While 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, behaviours, or the overall economic contribution.

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

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the role of unspoiled landscapes and dark skies in 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 the understanding of impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to evaluate tourism impacts has broader consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact

Assessment indicates that these economic vulnerabilities have not been adequately appraised as stipulated by the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependencies 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 demonstrates significant shortcomings in meeting the essential criteria for sustainable development, as established by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a central concern. This current application, however, is being assessed within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical analysis reveals that the application lacks a complete and reliable evidential foundation necessary for a thorough determination. Notable gaps exist in the baseline data, and there is continued reliance on an unspecified design envelope, alongside mitigation measures that have yet to be clearly defined. Furthermore, it neglects to address key impact pathways related to 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.

Moreover, the process has encountered clear procedural failings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally misaligned. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to prove that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, primarily due to the lack of tourism impact modelling. The

assessment of cumulative impacts from both offshore and onshore components is insufficient, leaving the effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning 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, which invokes the precautionary principle and prevents any lawful conclusion that the impacts can be deemed acceptable.

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

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

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

### **Additional Comments**

Along with many other accommodation providers throughout the Isles, we have made significant financial and physical investment in providing sustainable and attractive, a self catered cottage which is enjoyed by visitors from all over the world. The introduction of this windfarm will be the death of tourism resulting in many small business being forced to close.

**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: 119926E3

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

**Dear Sir/Madam**

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

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

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

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

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The 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 application has not provided a structured and reasoned comparison of realistic alternatives based on environmental effects, which is a significant shortcoming. Instead, it presents a narrative account of project evolution that fails to show that less harmful options have been properly identified, assessed, and chosen over more

damaging solutions. There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in determining impact, and the absence of such analysis raises questions about whether the proposed siting is the least damaging option.

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

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

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment 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 assessment of the ornithological impacts related to the proposed development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. It is crucial to note that 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 to demonstrate that these species will not be adversely affected. Additionally, the development is situated within key foraging areas and migratory pathways, yet there is a lack of robust evaluation regarding the implications of displacement, collision risk, or habitat loss.

Within the application lies a fundamental contradiction. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The assessment does not sufficiently address whether seabirds

associated with protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these vital feeding grounds is not fully considered, and reliance on modelling methods introduces uncertainty, particularly for species experiencing severe decline, such as Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses remain inadequately understood.

Moreover, the placement of turbines within a recognised migratory corridor introduces a substantial risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. There is an inadequate assessment of the long-term implications of continued mortality within this corridor, as well as 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 contradictory conclusions, coupled with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and precludes a lawful conclusion that would support consent.

Overall, the deficiencies identified illustrate a failure to comply with National Planning Framework 4 in terms of biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment concerning cultural heritage and community identity is profoundly insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where language, environment, tradition, and community are deeply intertwined. It adopts a simplistic view, treating heritage merely as isolated, static assets instead of recognising their continuous social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are categorised merely as static features in the assessment. This neglects their ongoing use and significance, as well as the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete evaluation of cultural effects and fails to acknowledge their vital role in community life.

Furthermore, the application neglects to consider intangible cultural heritage, including

the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment. These elements are integral to the area's identity but are entirely omitted from the assessment, marking a significant gap. Without taking these factors into account, it is impossible to fully grasp the cultural impact of the proposed development.

Additional worries arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that aligns with the characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has taken place, which undermines the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A crucial procedural flaw is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to evaluate the social, cultural, and economic ramifications for the island community. This omission alone renders any determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, alongside the neglect of living cultural practices, signifies a clear deviation from policy expectations.

Ultimately, the lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential void. The cultural ramifications of the development remain unassessed, and the application fails to offer a solid foundation for understanding the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The developer's commissioning of a Social Impact Assessment, which included focus groups with local residents, has resulted in a significant evidential gap due to the non-publication of the full report. This lack of transparency impedes both public understanding and the competent authority's ability to assess the social risks highlighted in the developer's own research. Available summaries indicate that local residents are already experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and should not be considered speculative. However, the omission of the complete assessment restricts scrutiny of the findings and diminishes the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal appears to pose a direct threat to community identity and cohesion, as evidenced by the developer's acknowledgment of "cultural loss." Despite this recognition, these social impacts have not been adequately incorporated into the

main application or given sufficient weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency compromises the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for projects of this scale, particularly those that may affect community character and functioning.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential that developments support positive health outcomes and mitigate harm. However, the existing evidence indicates adverse effects that have not been fully communicated. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

The implications of these procedural oversights are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, alongside documented existing adverse impacts, leads to an incomplete and unreliable assessment. This situation hinders lawful determination and underscores the inadequacy of the information supporting the application.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of visual impacts on the landscape, seascape, and cultural heritage is profoundly inadequate, failing to capture the extent of change and the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a notable sense of remoteness. The proposed large-scale turbines situated near the shoreline would impose a continuous industrial presence, fundamentally altering the character of the area and resulting in a permanent and irreversible transformation of the landscape.

This application does not accurately depict the scale of the visual change that would occur. The turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the severity of this impact or its significance within such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which compromises the credibility of the assessment.

Additionally, the failure to evaluate the interconnected relationship between

landscape, seascape, and cultural heritage is a serious shortcoming. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment neglects this interdependence, treating these assets as isolated, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This represents a visual impact alongside a broader cultural and spatial harm that has not been sufficiently assessed in the application.

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

Moreover, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be a dominant and unavoidable feature. The resulting change is, therefore, fundamental and permanent, not something that can be reduced to an acceptable level through mitigation.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and emphasise that the proposal is incompatible with the preservation of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment presented in this application is materially deficient, lacking the necessary detail to evaluate construction and pollution risks effectively. Significant seabed preparation and installation works are proposed within a high-energy Atlantic environment, yet fully developed Construction Environmental Management Plans and Pollution Prevention Plans are notably absent. Instead, the application places reliance on mitigation and contingency measures that are to be formulated after consent, obstructing any meaningful assessment of their potential adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming, considering 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. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the strategies for preventing, controlling, or monitoring these risks.

Furthermore, uncertainty surrounds the scale and behaviour of sediment plumes

resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats that are recognised as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether appropriate safeguards are established to address potential pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation need to be evaluated prior to granting consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the lack of detailed management plans, and uncertainty regarding potential impacts underscores the conclusion that the assessment is inadequate, ultimately preventing a thorough evaluation of construction and pollution risks.

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. The application fails to provide a robust evaluation of the ecological or socio-economic impacts, raising significant concerns about the protection and maintenance of these habitats and uses without substantial disruption. A critical issue lies in the assumption that fishing activities can be displaced without consequences. There is no evidence presented that alternative fishing grounds are available or capable of sustaining additional pressure. This lack of information is important, as the risk of overfishing in different areas poses potential wider economic implications for the local fleet.

Moreover, the proposal introduces considerable risks to marine species, particularly due to underwater noise from construction activities. The high-energy hammer piling anticipated over a prolonged period is expected to disturb marine life over extensive areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses the severity of these impacts without adequate supporting evidence.

Additionally, there exists an inconsistency within the application regarding the need for licences to permit harm to European Protected Species, while simultaneously

minimising the anticipated impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding adherence to the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

The assessment also overlooks the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The proposal involves onshore infrastructure that has been inadequately assessed, failing to consider the full range of impacts arising from what constitutes a single integrated project. The onshore works, which include cabling across protected moorland and the construction of a substation near Stornoway, are intrinsically linked to the offshore turbines. This assessment is fragmented, obscuring the true scale of both environmental and socio-economic effects.

Significant onshore activities involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically sensitive habitat. The absence of a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint. By deferring or excluding the evaluation of onshore impacts, the application fails to facilitate a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal raises substantial concerns regarding sensitive habitats, including machair systems and peatland environments, which are protected by policy. There is no evidence that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection. Moreover, the disturbance of peatland could release stored carbon, thereby generating a carbon debt that runs counter to the goals of renewable energy development. The application does not sufficiently address



this critical issue or demonstrate that the overall carbon balance is maintained as beneficial.

The routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the necessary consents or processes have been initiated, leading to concerns about both the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to conduct a holistic assessment of the project and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application. In conclusion, the separation of project components, the lack of comprehensive assessment, and the absence of evidence on environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The lack of assessment regarding nocturnal wildlife and dark skies represents a substantial gap in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism potential. The proposal includes permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application neglects to evaluate how this lighting might impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly significant given the vital role dark skies play in the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these aspects leads to a clear deficiency in the overall landscape and environmental evaluation.

More critically, there is no assessment of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means that the application does not address how the proposed aviation lighting might affect these species or lead to increased mortality rates.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities or the associated risks. Kittiwakes, for example, may forage or migrate at night and are also at risk of disorientation from artificial lighting, yet this hazard has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological

impacts.

Without an assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude potential adverse effects cannot be met, thereby invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Additionally, they weaken the comprehensive assessment of landscape and seascape impacts, as night-time character is an essential part of the overall environment.

In summary, the absence of any evaluation 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 unable to support a lawful determination.

## **TOURISM**

The application presents significant deficiencies in the assessment of tourism impacts, notably neglecting to analyse the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis regarding how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Since 2017, tourism has experienced 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. Despite this positive trend, the application fails to model the potential effects of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such analysis is vital to determine whether the proposed development would result in a net economic benefit or jeopardise a thriving sector.

Moreover, the assessment overlooks the critical role of environmental quality in sustaining tourism, particularly how unspoiled landscapes and dark skies enhance visitor experiences and contribute to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a notable void in understanding the potential impacts on this recognised and expanding segment of the local economy.

The implications of failing to assess tourism impacts extend beyond the immediate economic factors, affecting employment, local businesses, and community sustainability within a region that has limited economic diversification. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly evaluated, which is a requirement

under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to gauge the economic ramifications of the proposal effectively.

In summary, the failure to quantify tourism impacts, to assess the environmental factors influencing visitor behaviour, and to acknowledge the island's economic dependency leads to a significant evidential gap. This gap undermines any robust evaluation of economic effects and reinforces the conclusion that the application is incomplete.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm presents a significant failure in meeting the criteria for sustainable development, as outlined in statutory duties and national policy. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the scale of industrialisation was deemed unacceptable. This new proposal is put forth under a more stringent policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

This application lacks a comprehensive and dependable evidential foundation for its assessment. Notable deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways—such as effects on nocturnal wildlife, complete onshore infrastructure, and tourism—are evident. Consequently, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of significant effects or residual impacts.

Furthermore, there are evident procedural shortcomings. The failure to include a compliant Island Communities Impact Assessment is a violation of statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial omission. These flaws hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain ambiguous and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing any lawful conclusion that impacts are acceptable.

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

In summary, the application is unfit for determination, both procedurally and substantively. The magnitude of information deficits, coupled with policy inconsistencies and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, the competent authority must either reject the application on these bases or invoke appropriate regulatory measures to require the submission of the missing information.

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

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: DC8E447C

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The development is proposed off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal raise serious concerns about its alignment with statutory obligations, national policy, and sustainable development principles.

The application does not establish an adequate evidential basis for a lawful decision. Critical environmental data is absent, baseline information is insufficient and inconsistent, and essential elements of the proposal remain unclear. The application employs a flexible design framework, which obscures a clear understanding of potentially significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and substantial conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory requirements for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shore, raises significant issues regarding landscape capacity, visual impact, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, the precautionary principle must be invoked.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally flawed and does not deliver a comprehensive, transparent, or reliable account of the likely environmental consequences of the proposed development. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty compromises the integrity of the assessment and means that the impacts outlined may not accurately reflect the actual development that will be constructed. Consequently, both the public and the competent authority are unable to grasp the true extent of the environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed at a later stage obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and is in direct conflict with the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before any determination is made.

Significant evidential deficiencies are also present, including substantial gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application fails to meet the evidential threshold necessary under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity. It remains unproven that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, lack of specified mitigation measures, and gaps in baseline data makes the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information presented.

## **ASSESSMENT OF ALTERNATIVES**

The evaluation of alternatives presented in the application is insufficient and does not fulfil the requirements of the Environmental Impact Assessment. Instead of offering a structured and reasoned comparison of viable alternatives based on environmental impacts, the application merely recounts the project's development history. This

method does not establish that less harmful options have been effectively identified, evaluated, and chosen over more damaging alternatives.

There is a lack of transparent and evidence-based comparisons of different offshore locations, development sizes, or design configurations. Notably, the application fails to show that the developer has adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would probably be less severe. The sensitive nature of the West Lewis coastline and the critical significance of proximity to the shore in assessing impact highlight the failure to analyse these options, preventing any conclusion that the proposed site is the least damaging one.

This inadequacy also affects cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to determine if there are less harmful and more suitable alternatives available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is sustainable or complies with relevant policies.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot receive a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment related to marine ecology and protected species is fundamentally flawed. It lacks a thorough understanding of the ecological receptors within the West Lewis coastal environment, which is both sensitive and biologically active. The baseline data used in the assessment is incomplete, and the methodologies employed do not adequately capture information about species presence, behaviour, and habitat use. Consequently, the assessment cannot provide a reliable basis for evaluating potential impacts.

A significant issue is the handling of otters, which are a European Protected Species. The application does not adequately acknowledge their use of coastal areas for foraging and movement. By failing to assess their core foraging range and behavioural patterns, the application does not properly evaluate the potential impacts of construction disturbances, noise, and increased activity. This oversight undermines



any claims of no significant effects on this species.

In addition, the assessment of basking sharks suffers from serious deficiencies. The reliance on aerial surveys introduces a substantial detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks compared to established land-based observations that show frequent use of the area. The failure to integrate or appropriately consider this data further weakens the baseline and the reliability of the conclusions drawn.

These methodological shortcomings mean that the conclusions regarding negligible or non-significant effects are based on assumptions, not solid evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, activating the precautionary principle. Therefore, consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development is fundamentally flawed, exhibiting significant gaps in evidence and inconsistencies that cast doubt on its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. The placement of turbines in critical foraging areas and migratory pathways has not been properly evaluated regarding potential displacement, collision risk, or habitat loss.

A serious contradiction arises in the developer's findings, as they assert no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which should only occur where significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment, suggesting that the conclusions drawn are not backed by sufficient evidence. Furthermore, the assessment fails to show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods introduces uncertainty, particularly concerning species facing severe declines, like Kittiwakes and Fulmars. The

applied methodologies may underestimate mortality, especially given incomplete baseline data and insufficient understanding of behavioural responses.

The location of the turbines within a recognised migratory corridor adds another significant risk, creating a barrier along a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term effects of ongoing mortality in 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 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 situation invokes the precautionary principle and prevents a lawful conclusion supporting consent.

Overall, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal at odds with national policy. Collectively, these weaknesses make the assessment unreliable, as the internal inconsistencies and lack of solid evidence prevent a thorough evaluation of impacts, leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The treatment of cultural heritage and community identity within the assessment is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual significance of heritage, the application adopts a simplistic view, treating it as a collection of isolated, static assets.

Particularly concerning is the inadequate consideration of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are reduced to static features in the assessment. This oversight ignores their continued significance and the potential impact of development on their surroundings, resulting in a flawed evaluation of cultural effects and a neglect of their importance in community life.

Additionally, the application neglects to address intangible cultural heritage elements like the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These aspects are vital to the area's identity but are completely omitted from the assessment, which represents a major shortfall. The cultural ramifications of the development cannot be accurately grasped without acknowledging these factors.

Moreover, there are serious issues regarding community rights and engagement. The Gaelic-speaking population, identified as having a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement not only undermines the validity of the assessment but also contradicts established principles of participation in decisions impacting cultural and environmental interests.

A notable procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement stipulated by the Islands (Scotland) Act 2018. Without this essential assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially regarding the preservation of historic assets and places. The oversight in considering both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy expectations.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory requirements culminates in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a solid foundation for determining the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing poses significant challenges to the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the absence of the full report creates a substantial evidential gap. This omission limits both public understanding and the competent authority's ability to gauge the social risks identified in the developer's own research.

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. Nevertheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and hampers the assessment of their importance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with indications of "cultural loss" noted within the developer's findings. Despite the gravity of these impacts, they have not been adequately incorporated into the primary application nor given the necessary weight. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be compromised. The application does not provide the complete dataset required to establish a thorough evidential basis for balancing benefits against harm.

From a policy perspective, the application does not illustrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications are substantial, as the competent authority cannot conduct a rigorous socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment presented regarding seascape, landscape, and visual impacts falls significantly short of accurately capturing the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines positioned near the shoreline would establish an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently represent the extent of the visual transformation. Given their size and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots. This would detrimentally affect visual amenity and compromise the defining characteristics of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the most adverse scenarios, particularly concerning critical cultural heritage sites and valuable landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby undermining the

assessment's reliability.

Additionally, there is a notable failure to evaluate the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones, alongside other Scheduled Monuments, form part of a broader landscape intricately linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as independent entities without acknowledging their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This represents not merely a visual concern but a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 regarding the protection of natural environments and historic assets. The magnitude of change is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario analysis further weakens any assertion of policy compliance.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be unavoidable and dominant. Consequently, the resulting transformation is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

## **CONSTRUCTION AND POLLUTION RISKS**

The current proposal is deficient in its assessment of construction and pollution risks, lacking the necessary detail to adequately evaluate the likely environmental effects. Notably, the application involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated post-consent, thereby hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on undefined measures for future implementation is particularly troubling due to the sensitivity of the surrounding environment. The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. Although the application recognises

risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail regarding the preventative, control, or monitoring measures that would be employed.

Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. The absence of robust modelling and clearly articulated management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also applies to the possible effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing the establishment of contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to respond to any pollution incidents. This introduces procedural risks and compromises the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation measures be evaluated prior to granting consent, and the absence of such information impedes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential environmental impacts renders the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks and strongly suggest that the application remains incomplete.

## **FISHERIES AND MARINE LIFE**

The application proposes development that poses immediate and substantial risks to marine life and fisheries. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal lacks a thorough assessment of the ecological and socio-economic impacts, failing to demonstrate that these vital uses and habitats can be maintained without significant disruption.

A critical concern lies in the assumption that fishing activity can be displaced without repercussions. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of sustaining additional pressure. This significant omission raises the risk of overfishing in other areas and could have broader economic consequences for the local fishing fleet. Without a comprehensive and evidence-based evaluation, the potential impacts on fisheries and local livelihoods

remain unclear.

Furthermore, the proposal introduces considerable risks to marine species, particularly due to underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause disturbances across large distances, affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects, lacking adequate supporting evidence.

There is also a troubling inconsistency within the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

The assessment neglects to consider the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the project is fundamentally flawed, as it fails to evaluate onshore infrastructure in conjunction with offshore elements, resulting in a fragmented analysis that conceals the true magnitude of environmental and socio-economic repercussions. The offshore turbines are interconnected with onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and access routes across sensitive landscapes. These onshore activities involve excavation in areas of deep peat, notably within Barvas Moor, an essential carbon store and ecologically significant habitat. The absence of a thorough examination of these impacts hinders a complete understanding of the project's environmental footprint.

The lack of a unified assessment of both onshore and offshore impacts leads to an inadequate evaluation of cumulative effects, violating the Environmental Impact



Assessment process, which mandates consideration of all project components as a whole. Consequently, the combined impacts on peatlands, habitats, and local communities remain insufficiently understood. Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The proposal does not adequately demonstrate that the potential impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented, revealing a significant evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disturbance of peatland may release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application fails to address this critical issue or prove that the overall carbon balance is favourable. Moreover, routing infrastructure through active croft land raises potential conflicts with established land use and legal rights, with the application lacking evidence that necessary consents or processes have been initiated, raising serious questions about its feasibility and compliance with legal requirements.

From a policy standpoint, the application's failure to assess the project comprehensively and to ensure the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that the impacts can be avoided or mitigated further weakens the application. Collectively, the disjointed nature of the 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 both incomplete and unreliable, ultimately obstructing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap within 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 value. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, creates an intrusive "wall of light" effect across the western horizon. This alteration to the night-time environment is not addressed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors. Given the relevance of dark skies to local identity and emerging sectors such as astro-tourism, this omission is particularly concerning.

Moreover, the application neglects to evaluate the impacts on nocturnal wildlife, which is crucial given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting. Phototaxis can lead to disorientation and increased risk of collision for these species. The absence of any lighting impact assessment or phototaxis study means there is no consideration of how aviation lighting could affect these species and potentially increase mortality rates.

This critical oversight is further exacerbated by the reliance on daytime survey data

within the ornithological assessment, which fails to capture nocturnal activities and related risks. Species like Kittiwakes, which might forage or migrate at night, are equally at risk of disorientation from artificial lighting; however, this risk remains unassessed. Without site-specific night-time data, a fundamental understanding of ecological impacts is lacking.

Consequently, without a thorough 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 satisfied, invoking the precautionary principle and thereby hindering a lawful determination.

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts since the character of night-time environments is an essential aspect of the overall landscape.

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

## **TOURISM**

The assessment of tourism impacts is insufficient and neglects to consider the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would produce a net economic benefit or harm an established and growing sector.

Moreover, the assessment overlooks the role of environmental quality in promoting tourism, including how unspoiled landscapes and dark skies enhance visitor experiences and cater to 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 expanding part of the local economy.

Given the limited economic diversification within the island community, the failure to evaluate impacts on tourism carries broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show adherence to National Planning Framework 4, especially concerning economic impact and the obligation to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This undermines 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 illustrates a serious inadequacy in meeting the requirements for sustainable development, as measured against statutory obligations, national policy, and evidential standards. This application echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was identified. Although the current proposal is being evaluated under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to meet essential criteria.

There are glaring omissions in the evidential basis necessary for determination. The proposal lacks comprehensive baseline data and continues to operate within an undefined design envelope. Furthermore, it leans on unspecified mitigation measures and ignores critical impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential tourism repercussions. As a result, the Environmental Impact Assessment remains inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

The application is marred by procedural shortcomings. The missing Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, and the failure to provide the complete 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 resilience, rendering the application unsuitable for determination.

This proposal contradicts National Planning Framework 4. It does not illustrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. Additionally, the lack of tourism impact modelling raises doubts about the assertion of a net economic benefit.

The cumulative effects of both offshore and onshore components have not been sufficiently examined, leaving unclear implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist and may be significantly impactful. The assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential burden needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

Moreover, this proposal would lead to considerable and irreversible transformations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disturbances to cultural and visual connections, and the repercussions for tourism represent enduring effects that cannot be adequately mitigated.

Overall, the application is fundamentally and procedurally unfit for determination. The myriad information deficiencies, alongside policy discrepancies and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority is compelled to either refuse consent based on these grounds or invoke relevant regulatory provisions to mandate the submission of the outstanding 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**

Although living and working in Glasgow, I am from the Isle of Lewis. I think this project will adversely affect the islands and will be detrimental to wildlife. I am against this pursuit of so called green energy and 'net zero' at all costs . I don't think there has been an adequate consultation process.

**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: 7C8351A2

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

**Dear Sir/Madam**

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and associated documents, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The wind farm is proposed to be located off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the proposal centre on its scale, proximity to the shore, and design, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by strong evidence.

There are significant policy conflicts within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal presents additional concerns, with large turbines positioned very close to the shoreline, raising issues of landscape capacity, visual dominance, and environmental impact. Overall, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle should be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report presents several critical deficiencies that raise concerns about its reliability and transparency regarding the environmental effects of the proposed development. A significant issue is the adoption of a flexible Project Design Envelope, which lacks specific details about turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty and hinders the ability to apply a worst-case scenario consistently. Consequently, the reported impacts may not accurately reflect the actual development, leaving both the public and the competent authority unable to fully comprehend the environmental implications.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that are yet to be established. Seeking consent on the premise that environmental harm will be addressed in the future diminishes the opportunity for a meaningful evaluation of the effectiveness of these measures and the assessment of any residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and undermines the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly delineated before determination.

Additionally, there are significant gaps in the evidence presented, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainties surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainties that conflict with statutory requirements.

As a result, the application does not meet the evidential standards necessary under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes obligations pertaining to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

## **ASSESSMENT OF ALTERNATIVES**

The absence of a rigorous and thorough assessment of alternatives is alarming and fundamentally undermines the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a clear, reasoned comparison of viable

alternatives based on their environmental effects, the application merely recounts the project's development history. This method falls short of proving that less damaging options have been appropriately identified, assessed, and preferred over more harmful solutions.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding various offshore locations, development sizes, or design configurations. In particular, the application fails to illustrate that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, alongside the crucial role that proximity to shore plays in determining environmental impacts, highlights the significant gap in analysis that prevents a conclusion that the proposed siting is the least damaging option.

These shortcomings extend to the assessments related to cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors. This includes places of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and a comparative analysis indicates that mitigation by design has not been employed, relying instead on measures to mitigate impacts after the design phase.

Consequently, the application does not demonstrate that efforts have been made to minimise environmental harm through thoughtful site selection, layout, and infrastructure routing. This signifies a disregard for the established mitigation hierarchy, which consequently hampers the competent authority's ability to determine whether there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, one cannot assert that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and the wellbeing of local communities. The failure to present a structured and comparative assessment represents a significant omission, contributing to the conclusion that the application has not been thoroughly evaluated and cannot warrant a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species fails to provide a complete understanding of ecological receptors within the West Lewis coastal environment, which is a sensitive and biologically active marine system. The baseline data is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, this lack of comprehensive data undermines the assessment's reliability for evaluating potential impacts.

A significant oversight is the inadequate recognition and assessment of otters, which are a European Protected Species. The application does not properly address their



active use of coastal areas for foraging and movement. This omission means that the potential effects of construction disturbances, noise, and increased human activity have not been sufficiently evaluated, thereby questioning the conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduce significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to consider such critical data results in an incomplete baseline and detracts from the reliability of the conclusions presented.

The methodological shortcomings lead to assertions of negligible or non-significant effects based on assumptions rather than robust evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This contributes to uncertainty regarding the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainties introduced prevent the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these conditions, lawful consent cannot be granted.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a solid evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application presents an ornithological assessment that is fundamentally flawed, characterised by significant evidence gaps and internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not experience adverse effects. The development is situated within crucial foraging areas and migratory routes, yet the assessment does not sufficiently examine the potential consequences of displacement, collision risk, or habitat loss.

Moreover, there exists a fundamental contradiction within the application, where the developer concludes that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on

the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence provided. The assessment is inadequate in demonstrating that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be affected. The significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling methodologies introduces uncertainty, particularly for severely declining species 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 proposed siting of turbines within a recognised migratory corridor introduces an additional significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately evaluate the long-term implications of sustained mortality within this corridor or consider the potential impacts 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 contradictory conclusions, alongside gaps in data and limitations of the modelling, indicates that the standard of beyond reasonable scientific doubt has not been attained. This invokes the precautionary principle and hinders a lawful conclusion in support of the proposal.

Furthermore, the identified deficiencies constitute a failure to adhere to the National Planning Framework 4 in terms of biodiversity protection and the preservation of natural assets. The inability to establish that internationally important seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for determination.

## **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.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

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

Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation, yet without access to the full

assessment, proper scrutiny of the findings is unattainable. This limitation restricts the ability to ascertain the significance of these impacts in the decision-making process.

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

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

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

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a critical omission in the application and fails to satisfy the evidential criteria set forth by the Environmental Impact Assessment regime.

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The 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 evaluation of construction and pollution risks related to the proposal is severely lacking in detail, which hinders a proper assessment of its likely environmental impacts. Significant seabed preparation and installation are planned within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is notable. Instead,

the application relies on mitigation and contingency measures that are to be created after consent is granted, limiting any meaningful assessment of their sufficiency or effectiveness beforehand.

This reliance on unspecified future measures is particularly alarming, considering the sensitivity of the surrounding 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 potential risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate details on how these risks will be prevented, managed, or monitored.

There is significant uncertainty regarding the size and behaviour of sediment plumes that might result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application removes the opportunity to evaluate whether adequate measures are in place to address pollution events, thus introducing procedural risk. This situation undermines the competent authority's ability to assess the environmental protection measures effectively at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are assessed before consent can be granted. The application does not adequately demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainties surrounding potential impacts all contribute to a materially inadequate assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

## **FISHERIES AND MARINE LIFE**

The application proposes development activities that could significantly disrupt the marine ecosystem and the fishing industry off the West Lewis coast, yet it lacks a robust assessment of the ecological and socio-economic impacts. The region is home to a diverse marine ecosystem and an active fishing community, but the proposal fails to demonstrate how these critical uses and habitats will be protected or maintained.

A major concern is the assumption that displacing fishing activity can occur without

adverse effects. The application does not provide evidence that there are alternative fishing grounds that are available, accessible, or capable of handling any additional pressure. This gap in evidence is critical, as it presents the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear and evidence-based assessment, understanding the potential impacts on fisheries and livelihoods remains incomplete.

The proposal also poses significant risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns; however, the application diminishes the importance of these impacts without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment overlooks cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the offshore turbines and onshore works is fundamentally flawed and fails to account for the full extent of impacts stemming from what constitutes a singular integrated project. The interconnected nature of these elements necessitates a comprehensive evaluation, yet the current fragmented approach obscures the overall environmental and socio-economic effects.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing



sensitive landscapes. Significant excavation across areas of deep peat, notably within Barvas Moor, raises serious concerns due to the ecological sensitivity and carbon storage function of these habitats. The application lacks a thorough assessment of these impacts, which hinders an accurate understanding of the project's overall environmental footprint.

Moreover, the decision to exclude or defer the evaluation of onshore impacts obstructs an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the artificial separation of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

In addition, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are safeguarded by policy protection. The current application does not illustrate that the impacts on these habitats have been thoroughly assessed, nor does it confirm that appropriate avoidance measures have been implemented, thereby highlighting a significant evidential gap in biodiversity protection.

Concerns also arise regarding the project's carbon balance, as the disturbance of peatland may release stored carbon, potentially generating a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this critical issue and fails to demonstrate that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application does not furnish evidence that the necessary consents or procedural steps have been initiated, raising doubts about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project as a unified whole and to demonstrate the protection of peatlands, habitats, and land use interests directly contradicts 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 insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, inhibiting 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 coastline of West Lewis is renowned for its exceptionally dark skies, which contribute substantially to environmental quality, cultural identity, and tourism potential. The proposed

development introduces permanent red aviation lighting that would be visible from long distances, creating an intrusive “wall of light” effect across the western horizon, thereby fundamentally changing the night-time environment.

Furthermore, the application fails to consider the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given the significance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The oversight in assessing these effects leads to a notable deficiency in the comprehensive landscape and environmental evaluation.

Of greater concern is the absence of an analysis regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can cause disorientation and elevate collision risks. The application does not provide a lighting impact assessment or conduct a phototaxis study, failing to evaluate how aviation lighting might influence these species or contribute to increased mortality rates.

Additionally, the reliance on daytime survey data in the ornithological assessment does not adequately address nocturnal activity or the associated risks. Other species, including Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting; however, this risk has not been investigated. The lack of site-specific night-time data creates a substantial gap in understanding 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 evidential standard necessary to exclude potential negative impacts beyond reasonable scientific doubt is not met, thereby engaging the precautionary principle and obstructing a lawful determination.

From a policy perspective, the omission is at odds with the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It also detracts from the overall evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

## **TOURISM**

The evaluation of tourism impacts presented in the application is severely lacking and does not adequately address the economic and social ramifications for a crucial 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 the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contributions they make.

Tourism on the island has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nonetheless, the application neglects to assess how the industrialisation of the seascape and any resultant decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would yield a net economic advantage or jeopardise an established and burgeoning sector.

The assessment also overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies to the visitor experience. This is especially relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given that this is an island community with limited economic diversification, the failure to evaluate the impacts on tourism extends to broader concerns regarding 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 properly examined, as required under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic reliance of the island culminates in a significant evidential gap. This deficiency undermines 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 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**

As a couple that regularly visit the western isles, mainly Lewis. I can already see the devastating effects this will have on the communities living there, so much of the income generated on the island is from tourism. With the cost of living crisis a very real problem on the island, and given that those who live nearest or can see the proposed solar farm would not even be compensated with reduced energy bills. I see a decline in tourists visiting the islands.

Not to mention the initial destruction of the sea scape and Habitats for birds and marine life, there is also the detrimental effects to human health through infrared sound waves being sent out miles and miles.

I strongly object to this proposed idea, I suggest that wave farms would be less intrusive and better for the communities, marine birds and sea life and much less visually disruptive views from the coast which brings in so much revenue for the whole island community.

Thank you for taking your time to read this,

Best wishes,

Emily

**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: 59666B64

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

**Dear Sir/Madam**

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a detailed review of the Environmental Impact Assessment Report and associated documentation, revealing several critical deficiencies related to planning, environmental considerations, cultural heritage, 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 significant cultural identity. The scope, design, and scale of the proposed development give rise to serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application is fundamentally flawed due to the absence of a robust evidential basis necessary for a lawful determination. Essential environmental data is lacking, while the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The employment of a flexible design framework hampers a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures precludes any evaluation of their effectiveness. Consequently, the documentation does not furnish a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by adequate evidence.

Moreover, there exist clear and substantive conflicts with existing policies. 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 adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests required for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

In addition, the unprecedented scale of the proposal poses significant challenges, with large turbines located in close proximity to the shoreline, which raises profound concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential shortcomings, and pronounced non-compliance with policy clearly indicate that the application is incomplete and insufficient to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

## **ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent overview of the expected environmental effects of the proposed project. The employment of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and hinders the application of a worst-case scenario analysis. This deficiency compromises the assessment's integrity, resulting in a lack of clarity for both the public and the competent authority regarding the actual environmental impacts that may arise from the development.

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

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

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

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

## **ASSESSMENT OF ALTERNATIVES**



The application presents significant shortcomings in its assessment of alternatives, which fails to align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned evaluation of feasible alternatives based on their environmental impacts, it provides a narrative of the project's evolution. This method does not adequately demonstrate that less harmful options have been effectively identified, assessed, and selected over more damaging solutions.

There is a lack of transparent, evidence-based comparisons between alternative offshore locations, development scales, or design configurations. Notably, the developer has not sufficiently explored the possibility of placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be reduced. Given the sensitivity of the West Lewis coastline, along with the critical role that proximity to shore plays in determining impact, the failure to include such an analysis renders it impossible to ascertain whether the proposed siting is indeed the least damaging option.

These deficiencies also apply to the cable routing and landfall assessment, where evidence is insufficient to prove that alternative routes have been adequately considered to avoid or reduce impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

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

From a policy standpoint, these deficiencies severely undermine compliance with National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a material flaw that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot sustain a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The coastal environment of West Lewis is characterised by a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. There is an incomplete understanding of ecological receptors within this area, primarily due to inadequate baseline data and ineffective methodologies that fail to accurately capture the presence, behaviour, and habitat use

of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A notable oversight in the application involves otters, which are classified as a European Protected Species. The assessment does not adequately acknowledge their active use of coastal areas for foraging and movement, and it overlooks their core foraging range and behavioural patterns. This omission means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated, ultimately undermining claims of no significant effects on the species.

Further issues arise with the assessment of basking sharks, which relies heavily on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or appropriately consider such information results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The limitations in these methodologies lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application significantly fails to meet the evidential threshold necessary to demonstrate that no adverse effects will occur on the integrity of protected sites. A fundamental contradiction arises as the developer claims there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only appropriate when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the ornithological assessment and suggests that its conclusions lack sufficient support from the underlying evidence.

Key foraging areas and migratory pathways, crucial for internationally important seabird populations, are within the development's location, yet the assessment inadequately evaluates displacement, collision risk, or habitat loss. The west coast of the Isle of Lewis is home to seabird populations that are already declining, yet the evidence provided fails to adequately confirm that these species will remain unaffected. The reliance on modelling approaches introduces further uncertainty, particularly for severely declining species like Kittiwakes and Fulmars, while the methodologies used are likely to underestimate mortality, especially in the absence of comprehensive baseline data and a full understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor represents an additional significant risk, creating a barrier along a primary flight path that is essential for species travelling between the United Kingdom and Iceland. The assessment does not thoroughly consider the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

Moreover, the deficiencies in the assessment are indicative of a broader failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The presence of contradictory conclusions, in conjunction with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle, obstructing a lawful conclusion in support of consent.

In conclusion, the assessment is inherently unreliable due to its internal inconsistencies, methodological weaknesses, and lack of robust evidence. These deficiencies hinder a thorough evaluation of impacts and confirm that the application does not satisfy the statutory requirements necessary for a positive determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the application fails to acknowledge this connection and instead adopts a simplistic view of cultural heritage as isolated, static assets, disregarding their vital social, cultural, and spiritual roles within the community.

A notable shortcoming is the treatment of important cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These active sites of burial and spiritual practice are mischaracterised as static features, with the assessment neglecting their ongoing use and the significance of their settings. This misrepresentation leads to an incomplete understanding of the cultural effects of development, failing to respect their importance in community life.

Moreover, the assessment does not take into account intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's

identity and are glaringly absent from the assessment, which is a significant oversight. Without evaluating these aspects, the cultural impact of the proposed development remains inadequately understood.

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

A major procedural flaw is the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, along with the neglect of living cultural practices, represents a clear deviation from policy expectations.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and legal obligations leads to a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and as such, the application fails to provide a solid foundation for understanding the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been made public. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from understanding the full extent of social risks identified by the developer's own research. Available summaries suggest that residents are already feeling stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation. However, without access to the complete assessment, proper scrutiny of these findings is not possible, which limits the ability to evaluate their significance in the decision-making process.

There is evidence that the proposal is seen as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, these impacts have not been adequately considered in the main application. The withholding of the full Social Impact Assessment conceals the true human and social costs of the development. This lack of transparency 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 functioning are at risk. Without the complete dataset, the application does not provide a comprehensive basis for assessing the balance between benefits and harm.

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

The implications of these procedural issues are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material 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, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This ultimately prevents a lawful determination and confirms that the application lacks sufficient supporting information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The current application presents significant shortcomings in its assessment of seascape, landscape, and visual impacts. It inadequately captures the scale of change and overlooks the sensitivity of the environment in question. The West Lewis coastline, characterised by its expansive Atlantic horizon and undeveloped landscape, possesses a profound sense of remoteness. Introducing large-scale turbines near the shore would result in a continuous industrial presence, fundamentally altering this cherished character and leading to a permanent transformation of the landscape.

The visual changes projected are not sufficiently articulated in the application. The sheer scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and compromising the intrinsic qualities of naturalness and remoteness. The assessment fails to communicate the extent of this impact and its significance within such a sensitive landscape context.

There are also notable methodological issues regarding the chosen visual viewpoints. Evidence indicates that these viewpoints may not adequately capture the perspectives of the most sensitive receptors or represent worst-case scenarios, particularly concerning culturally significant heritage sites and valuable landscapes. This raises concerns that the assessment may downplay the true magnitude of the visual impact, casting doubt on its reliability.

Moreover, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context, linked to the Atlantic horizon through visual and spatial relationships. By treating these sites as

isolated entities, the assessment misses the crucial interdependence that informs their cultural significance, leading to an incomplete evaluation of impacts on their settings.

The industrialisation of the seascape poses a threat to these relationships, fundamentally altering how heritage assets are perceived and disconnecting them from their natural horizon. This situation represents more than just a visual impact; it inflicts a cultural and spatial harm that has not been sufficiently assessed.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the preservation of natural places and historic assets. The magnitude of the proposed change is at odds with the imperative to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

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

In summary, the assessment fails to accurately convey the scale of the impact, the sensitivity of the environment, and the intertwined 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 vital landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

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

Concerns are amplified by the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

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

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

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

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

## **FISHERIES AND MARINE LIFE**

The assessment concerning fisheries and marine life lacks depth and fails to provide a solid evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats can be preserved or maintained without considerable disruption.

A critical concern is the assumption that fishing activities can simply be relocated without repercussions. The application does not present evidence showing that alternative fishing grounds are viable, accessible, or able to support the additional strain. This significant omission raises alarms, as the displacement of fishing could lead to overfishing in other areas, potentially harming the local fishing fleet's economic stability. Without a thorough and evidence-based evaluation, the repercussions on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses substantial threats to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is likely to cause disturbances across vast distances, impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects without adequate substantiation.

The application exhibits a clear inconsistency by acknowledging the necessity for licences to authorise harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal approval.



Additionally, the assessment neglects to consider cumulative impacts that arise from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. Absent a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, thereby undermining any assertion that the proposal constitutes sustainable development.

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

### **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts from this single integrated project. The offshore turbines and the onshore works are closely connected; however, they are evaluated independently. This fragmented approach masks the true extent of the environmental and socio-economic repercussions.

Included in the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon store and is an ecologically delicate habitat. The application fails to provide a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively; yet, the division of offshore and onshore components results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that adequate avoidance measures have been implemented. This reveals a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the objectives of

renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises concerns about deliverability and lawful implementation.

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

In summary, the disjunction of project components, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thereby obstructing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The proposed application introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This lighting is visible over long distances and fundamentally alters the night-time environment. A significant concern arises from the absence of an assessment regarding the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Dark skies are a key component of environmental quality, cultural identity, and tourism value in the West Lewis coastline, which is characterised by exceptionally dark skies. The lack of consideration for the importance of dark skies, particularly in relation to emerging sectors such as astro-tourism, creates a substantial gap in the Environmental Impact Assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife, despite the presence of sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are susceptible to disorientation and increased collision risk due to artificial lighting. The application fails to include a lighting impact assessment or phototaxis study, thereby neglecting to evaluate how the aviation lighting might affect these species and potentially increase mortality rates. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not capture nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed.

The lack of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would be adversely affected. Consequently, the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, which

engages the precautionary principle and prevents a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the broader assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The application lacks baseline data, impact modelling, and species-specific analysis, rendering it incomplete and incapable of supporting a lawful determination.

## **TOURISM**

The failure to assess the implications of the proposed development on tourism represents a significant oversight, given the economic dependency of the Isle of Lewis on this sector. Tourism has increased notably, with its contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the local economy. The absence of a thorough analysis regarding how large-scale offshore infrastructure might alter visitor numbers and behaviours hinders an accurate understanding of the potential impacts on economic contribution.

Tourism thrives on the area's wild coastline, near-pristine landscapes, and dark skies, all of which provide a unique visitor experience. The application acknowledges that 86% of tourists are attracted by the scenery, yet it does not offer a quantified assessment of how the industrialisation of the seascape could detract from these vital attractions. The lack of consideration for environmental quality, particularly concerning unspoiled landscapes and dark skies, further complicates the evaluation of the tourism sector's potential decline.

Moreover, the failure to incorporate a Dark Skies Assessment leaves a critical gap in understanding the effects on nature-based and astro-tourism, both of which are emerging markets that could significantly benefit the local economy. In an island community where economic diversification is limited, this lack of assessment has broader ramifications for employment, local businesses, and community sustainability.

The submission also falls short in meeting policy requirements, failing to demonstrate adherence to the National Planning Framework 4 regarding economic impacts and the necessity to show net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Taken collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic vulnerabilities of the island culminate in a significant evidential gap. This situation precludes a thorough evaluation of the economic effects and suggests that the application is incomplete.

## SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the standards of sustainable development when evaluated against statutory requirements and national policy. This application brings forth the same fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically concerning unacceptable levels of industrialisation. The current proposal is submitted within a stronger policy context that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the application is incomplete and unreliable. There are significant gaps in baseline data, it employs an undefined design envelope, and relies on unspecified mitigation measures. Additionally, critical impact pathways have been overlooked, including nocturnal wildlife, the complete onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are notable failures. The lack of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment is a material oversight. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks are uncertain and could be significant. The assessments of marine ecology, seabirds, protected species, and marine mammals lack completeness and are inconsistent in places. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle, which prevents a lawful conclusion regarding the acceptability of impacts.

The proposal would bring about considerable and irreversible alterations to a 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, are permanent changes that cannot be adequately mitigated.

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

authority should refuse consent based on these grounds or enforce the relevant regulatory provisions to obtain the necessary missing information.

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

**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: 50331C02

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

**Dear Sir/Madam**

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

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are gaps in critical environmental data, while baseline information is both limited and inconsistent. Additionally, essential elements of the proposal remain unspecified. The application employs a flexible design framework, which obscures the understanding of potential significant effects. The reliance on yet-to-be-defined mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Substantial conflicts with policy are apparent. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and well-being. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development aligns with policy expectations.

The unprecedented scale of the proposal poses significant challenges in this location, with large turbines planned in close proximity to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be 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 absence of a comprehensive and structured assessment of alternatives significantly undermines the application's compliance with the statutory requirements set out by the Environmental Impact Assessment regime. Instead of offering a reasoned and transparent evaluation of viable alternatives based on their environmental



implications, the application merely recounts the evolution of the project. This narrative approach fails to prove that less harmful options have been thoroughly identified and evaluated in preference to those with greater potential for damage.

Moreover, there is no evidence-based or transparent comparison regarding alternative offshore locations, development scales, or design configurations. The developer has not convincingly explored the possibility of siting turbines further offshore, where the potential for visual, ecological, and coastal impacts may be mitigated. The sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impacts make the lack of such analysis particularly concerning. This shortcoming prevents any reasonable conclusion regarding whether the proposed location represents the least damaging option available.

The shortcomings are also evident in the assessment of cable routing and landfall, where there is inadequate evidence demonstrating that alternative routes have been properly considered to avoid or minimise 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 measures have not been integrated into the design phase, relying instead on post-design mitigation approaches.

Consequently, the application does not establish that environmental harm has been minimised through site selection, layout, and infrastructure routing. This oversight signifies a breach of the established mitigation hierarchy, thus preventing the competent authority from assessing whether more appropriate and less harmful alternatives could be available. In the absence of a robust assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with relevant policy frameworks.

From a policy standpoint, this inadequacy raises serious concerns regarding compliance with National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission that leads to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species is fundamentally inadequate, failing to provide a comprehensive or trustworthy 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 presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of the species within this marine system. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant oversight involves the otters, classified as a European Protected Species,

where the application neglects to appropriately acknowledge and assess their usage of coastal regions for foraging and movement. Without considering their core foraging range and behavioural tendencies, the assessment does not adequately address the possible impacts of construction-related disturbances, noise, and increased human activity. This shortcoming undermines any conclusions drawn about the lack of significant effects on this particular species.

Moreover, the evaluation of basking sharks reveals further deficiencies; reliance on aerial surveys leads to substantial detection bias, especially under Atlantic conditions. This method is likely to result in an underestimation of their presence, particularly when compared to established land-based observations that suggest these waters are frequently used by the species. The oversight in incorporating or accurately considering such information leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that conclusions regarding negligible or non-significant effects are largely based on assumptions rather than solid evidence. Additionally, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and the broader ecosystem interactions. This uncertainty clouds the true extent of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been no thorough identification or assessment of protected species. The uncertainty generated by these deficiencies obstructs the exclusion of adverse effects beyond reasonable scientific doubt, necessitating adherence to the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. However, the ornithological assessment associated with the development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to meet the required evidential standard necessary to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A major contradiction arises within the application itself, as the developer claims no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are unsupported by the evidence provided. The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It inadequately considers the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially due to incomplete baseline data and an incomplete understanding of behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor presents a significant risk by creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required 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 the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies also indicate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

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

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of cultural heritage and community identity is severely lacking, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. Rather than recognising heritage as a living, dynamic element, the application simplifies it into isolated, static assets. This flawed perspective neglects the ongoing social, cultural, and spiritual significance of these elements within the community.

Particularly alarming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely historical

markers; they are active locations for burial and spiritual practices. The assessment reduces them to static features, ignoring their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity, yet they are entirely absent from the evaluation, representing a significant gap. Without addressing these factors, the true cultural impact of the development remains obscured.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, with recognised characteristics of Indigenous Peoples, yet the application does not include a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and contravenes established principles that call for participation in decisions affecting cultural and environmental matters.

A major procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone obstructs a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, coupled with a failure to recognise living cultural practices, constitutes a clear deviation from policy mandates.

Taken as a whole, the failure to assess living heritage, intangible cultural value, community rights, and statutory duties creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately examined, and the application does not provide a sufficient foundation for understanding the true cultural cost of the project.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The procedural implications of this situation are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission within the application indicates a failure to meet the evidential standards required under the Environmental Impact Assessment regime.

Moreover, there is a significant deficiency in the assessment of social impacts, health, and wellbeing, which lacks the transparency needed for a lawful evaluation. The

developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This creates a considerable evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted in the developer's own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are therefore not speculative in nature. Nonetheless, the failure to disclose the complete assessment obstructs proper examination of the findings and restricts the capacity to ascertain their significance in the decision-making process.

In addition, the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” acknowledged in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or assigned appropriate significance. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly in relation to potential effects on community character and functionality. By failing to provide the complete dataset, the application does not offer a sufficient evidential foundation 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 must promote positive health outcomes and mitigate harm; however, the evidence currently available suggests the presence of adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to establish compliance with this policy.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application lacks adequate information to support it.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate and does not properly address the extent of the anticipated change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would impose a continuous and overwhelming industrial presence,

fundamentally transforming this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to accurately depict the magnitude of the anticipated visual change. Given their scale and proximity, the turbines would dominate the views from residential areas, historic locations, and frequently visited coastal sites. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant cultural heritage sites and high-value landscapes. This raises the possibility that the assessment may have understated the magnitude of visual impact, thereby compromising the overall reliability of the evaluation.

A significant oversight is the failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape, interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their context and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the preservation of natural places and historic assets. The extent of change proposed is inconsistent with the obligation 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 requirements.

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

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

## CONSTRUCTION AND POLLUTION RISKS

The proposal raises serious concerns due to its incomplete assessment of construction and pollution risks, which lack the necessary detail to evaluate potential environmental effects. It involves significant seabed preparation and installation works within a dynamic 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 are to be established after consent, which hampers any meaningful evaluation of their effectiveness or adequacy.

This uncertainty is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilization and the possibility of accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies.

Moreover, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty also extends to the potential effects on already identified sensitive marine species and habitats within the broader assessment.

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

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated prior to granting consent. When critical information is absent, a lawful determination cannot be achieved. Furthermore, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, a lack of detailed management plans, and the uncertainty surrounding potential impacts renders the assessment significantly deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

## FISHERIES AND MARINE LIFE



The application presents significant deficiencies in its assessment of fisheries and marine life, rendering the evaluation incomplete and unreliable. The proposal introduces substantial risks to marine species, particularly due to the high-energy hammer piling that would generate underwater noise over an extended period. This activity is likely to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to downplay these effects, failing to provide sufficient evidence to support this minimisation.

A primary concern is the assumption made within the application that fishing activities can simply be displaced without any repercussions. It does not provide evidence that alternative fishing grounds exist, are accessible, or can support the resulting pressure from displacement. This is a critical oversight, as such displacement may lead to overfishing in other areas and could have wider economic implications for the local fishing fleet. Without a solid, evidence-based assessment, it is impossible to fully understand the implications for fisheries and local livelihoods.

Furthermore, the assessment neglects to consider the cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is crucial, as it is necessary to ascertain the overall impact on marine ecosystems and socio-economic conditions.

There is also an inconsistency within the application regarding the need for licences to permit harm to European Protected Species. While the potential for harm is acknowledged, the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises significant concerns about compliance with the Habitats Regulations, particularly in instances where harm necessitates legal authorisation.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal can be classified as sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the presence of internal inconsistencies collectively hinder a robust evaluation of impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The proposed project presents significant shortcomings in its assessment of onshore infrastructure, which is incomplete and does not encompass the full range of impacts stemming from what constitutes a single integrated project. The onshore works, which include cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes, are intrinsically linked to the offshore turbines. However, these components are assessed

separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The absence of a thorough assessment of the impacts associated with the onshore elements particularly fails to address the implications of excavation across areas of deep peat, especially within Barvas Moor, a significant carbon store and ecologically sensitive habitat. This gap in the assessment prevents a comprehensive understanding of the overall environmental footprint of the project.

Furthermore, the application's exclusion or deferral of the evaluation of onshore impacts hinders the proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be examined collectively; however, the disjointed evaluation of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities inadequately understood.

There are also serious concerns regarding potential risks to sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. The application lacks evidence that these impacts have been fully assessed or that appropriate measures to avoid them have been established, revealing a substantial evidential gap in relation to biodiversity protection.

The proposal raises additional issues related to carbon balance, as the disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this critical issue or demonstrate that the overall carbon balance remains favourable.

Moreover, the routing of infrastructure through active croft land presents possible conflicts with existing land use and legal rights. There is a lack of evidence confirming 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 in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

Collectively, the fragmentation of project components, the lack of comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, which in turn obstructs a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The Environmental Impact Assessment notably fails to address the crucial elements of 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 would be visible over long distances, resulting in an intrusive “wall of light” effect along the western horizon, thereby fundamentally changing the night-time environment.

The application neglects to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant considering the importance of dark skies to local identity and to emerging sectors like astro-tourism. Consequently, there is a clear gap in the overall landscape and environmental assessment.

More alarmingly, the proposal does not assess the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means that potential effects of aviation lighting on these species and the associated risk of increased mortality have not been considered.

This shortcoming is further exacerbated by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the 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 significant gap in understanding the ecological impacts of the proposal.

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

From a policy viewpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural environments and quality. Moreover, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the ecological setting.

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

## **TOURISM**

The evaluation of tourism impacts within the application is fundamentally flawed, lacking a comprehensive analysis of the economic and social ramifications for a vital segment of the Isle of Lewis's economy. Tourism thrives on the region’s wild coastline,

its largely untouched landscapes, dark skies, and an overarching sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, the application fails to provide any quantifiable assessment regarding how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions of tourism.

The growth of tourism has been remarkable, escalating from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the proposal does not simulate how the potential industrialisation of the seascape and the degradation of environmental quality might affect Tourism Gross Value Added or the broader economic resilience. The lack of such crucial analysis renders it impossible to ascertain whether the development would produce a net economic benefit or threaten an established and expanding sector.

Furthermore, the assessment neglects to acknowledge the significance of environmental quality in fostering tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences and in burgeoning markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a vital and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the oversight in assessing tourism impacts carries broader consequences for employment, local enterprises, and community sustainability. The absence of a proper Island Communities Impact Assessment signifies that these economic vulnerabilities have not been scrutinised as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and falls short of supplying sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, these deficiencies in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and recognising the island's economic dependence culminate in a substantial evidential gap. This gap obstructs a thorough assessment of the economic effects and supports the conclusion that the application is inadequate.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable scale of industrialisation was a decisive factor. Despite being submitted under a more robust policy framework that prioritises biodiversity,

peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential foundation necessary for informed determination.

There are significant deficiencies in the baseline data provided, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the failure to address key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, render the Environmental Impact Assessment inadequate. This lack of completeness prevents a thorough understanding of likely significant effects or any residual impacts.

The procedural failures are evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are sufficient to deem the application unfit for determination.

In direct violation of National Planning Framework 4, the proposal fails to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the necessary regulatory provisions to compel the submission of the missing information.

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

## Additional Comments

"New peer-reviewed research published in 2026 predicts that infrasound from turbines at this scale would exceed safe cardiac health thresholds as far away as 46km.

The closest turbine would be only 6km from the Lewis shore and less than 35km from Stornoway

Infrasound is sound below the threshold of human hearing, i.e. you can't consciously detect it, but your body can. Wind turbines generate it constantly, in a persistent rhythmic pulse that your nervous system is hardwired to respond to.

This can cause harm in a number of ways including sleep disturbance, cardiovascular effects, anxiety, and cognitive impairment.

Infrasound was scoped out of (excluded from) the environmental assessment for N4 on the basis of a 1997 methodology but the science has moved on.

New research published in 2026 has established, for the first time, the precise physiological mechanism by which it causes harm through the vestibulo-cochlear system and pressure-sensitive ion channels in your cells.

The same research shows that large, modern turbines generate infrasound at levels far higher and over far greater distances than existing regulations assume."

This project therefore, is a clear and serious health risk to residents of the Isle Of Lewis, and must be shelved. Period.

**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: B3C52786

**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 an examination of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise from the scale, proximity, and design of the proposed development, which appear incompatible with statutory requirements, national policy, and the principles of sustainable development.

A crucial issue lies in the inadequacy of the evidential basis provided for a lawful determination. Essential environmental data is absent, and the baseline information presented is limited and inconsistent. Moreover, critical aspects of the proposal remain undefined. The flexible design framework utilised obscures the understanding of potentially significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a complete or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are substantial policy conflicts evident within the proposal. 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 demonstrate that national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests required for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, especially with the positioning of large turbines in close proximity to the shoreline. The combination of inadequate information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**



The Environmental Impact Assessment Report lacks the necessary detail and transparency to reliably account for the potential environmental effects of the proposal. The flexibility allowed by the Project Design Envelope, which does not commit to specific turbine dimensions or layouts, introduces considerable uncertainty. This creates challenges in applying a worst-case scenario consistently, thereby undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent what will ultimately be constructed, leaving both the public and the competent authority unable to understand the true extent of the environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the assumption that environmental harm will be managed later does not allow for a proper evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly identified before any determination is made.

Additionally, there are serious evidential deficiencies present, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the assessment concludes that effects are negligible or non-significant without robust supporting data. The lack of adequate information hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required 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 comply with National Planning Framework 4, which includes obligations related to biodiversity protection and environmental integrity, as it cannot be demonstrated that the impacts have been fully assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, preventing the competent authority from making a determination based on the information submitted.

## **ASSESSMENT OF ALTERNATIVES**

The evaluation of alternatives in the application is fundamentally inadequate and fails to satisfy the statutory requirements mandated by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental impacts, the submission provides merely a narrative of the project's development. This methodology does not demonstrate that

less harmful options have been sufficiently identified, assessed, and selected over more damaging alternatives.

A clear and evidence-driven comparison of different offshore locations, varying development scales, or design configurations is absent. Notably, the application does not prove that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact, the lack of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient documentation that alternative routes have been adequately examined to avoid or mitigate effects 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 suggest that there has been no application of mitigation by design, instead relying heavily on measures to mitigate post-design.

Consequently, the application does not establish that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it is impossible to determine that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a significant shortcoming that contributes to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive and reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the methodologies used are inadequate, resulting in incomplete baseline data that do not capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for properly evaluating potential impacts.

A significant oversight is the failure to adequately recognise and assess the presence of otters, a species protected under European law, particularly concerning their foraging and movement within coastal zones. The neglect of their core foraging range and

behavioural patterns leads to an insufficient assessment of the potential effects of construction-related disturbances, such as noise and increased human activity. This omission undermines any claims made about the absence of significant effects on this species.

The assessment of basking sharks reveals further weaknesses, with an over-reliance on aerial surveys that carry a substantial risk of detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations showing their regular use of these waters. The lack of proper consideration of such pertinent data results in an incomplete baseline, further diminishing the reliability of the conclusions reached.

These methodological shortcomings indicate that conclusions regarding negligible or non-significant effects stem from assumptions rather than solid evidence. The inadequate baseline data also hinder a thorough evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. As a result, there remains considerable uncertainty concerning 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 National Planning Framework 4, as it fails to accurately identify or assess protected species. The uncertainty introduced by these deficiencies prevents the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent is not legally justifiable.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The ornithological assessment presents significant gaps in evidence, internal inconsistencies, and methodological weaknesses that undermine its conclusions regarding the development's impact on seabird populations. The site is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction exists within the application, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. This is only necessary when significant harm is expected, raising questions about the assessment's reliability. Furthermore, the assessment fails to

provide sufficient evidence 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 is not comprehensively considered, and the reliance on modelling approaches introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, particularly where baseline data is incomplete and the behavioural responses of species are not fully understood.

The siting of turbines within a recognised migratory corridor poses additional and significant risks, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor and the potential effects on species with relatively small global populations are not thoroughly assessed.

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents a lawful conclusion in favour of consent. Additionally, the deficiencies identified contravene National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings 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 assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise it as a living cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts a narrow perspective that reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight disregards their continued use, meaning, and the impact that development could have on their setting. As a result, the evaluation of cultural effects is incomplete and ignores their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the

coastal environment. These elements are crucial to the area's identity, yet they are entirely overlooked, resulting in a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been engaged through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Another critical failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

These deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to address both tangible and intangible heritage, alongside the disregard for living cultural practices, marks a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient to assess the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency surrounding the Social Impact Assessment undermines the Environmental Impact Assessment process. It is essential to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, particularly when community character and functionality may be affected. Without the complete dataset, the application fails to provide a solid evidential foundation for evaluating the balance between potential benefits and harm.

Moreover, the developer's own findings highlight that the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" being identified. However, these impacts have not been adequately incorporated into the primary application or given the necessary consideration. This omission obscures the genuine human and social costs of the development.

The assessment of social impacts, health, and wellbeing is materially deficient and lacks the transparency required for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made public. This significant evidential gap

hinders both the public and the competent authority from grasping the full extent of the social risks identified through the developer's research.

Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative. However, the inability to disclose the full assessment restricts proper scrutiny of the findings and limits the capacity to ascertain their importance within the decision-making process.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must facilitate positive health outcomes and avoid causing harm, yet the available evidence suggests existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

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

Taken together, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and strengthens the conclusion that the application is not backed by sufficient information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The West Lewis coastline, characterised by its expansive Atlantic horizon and an undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a continuous industrial presence that fundamentally alters this unique character, leading to an irreversible transformation of the landscape. The application fails to adequately convey the magnitude of this visual change. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, impacting visual amenity and diminishing the inherent qualities of naturalness and remoteness.

Concerns arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests these viewpoints may not effectively represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which in turn undermines the assessment's reliability.

Moreover, the application does not consider the interconnectedness of landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape

setting that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities fails to recognise their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance. The introduction of industrial elements to 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 merely a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The extent of change proposed does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

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

In summary, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The application presents significant shortcomings that raise urgent concerns regarding environmental protection. There is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This lack of detail hampers the evaluation of likely environmental effects, as the proposal involves extensive seabed preparation and installation works within the challenging conditions of a high-energy Atlantic environment. By relying on undefined future mitigation and contingency measures, the application leaves critical questions about their adequacy and effectiveness unanswered.

Particularly alarming is the potential impact on the West Lewis coastline, which is home to clean coastal waters and vital habitats. These areas are highly sensitive to disturbances from sediment and contamination. While the application does acknowledge risks associated with sediment mobilisation and possible chemical or oil spills, it fails to adequately outline how these threats will be managed or mitigated. The uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation adds to the urgency of these concerns, as it is impossible to ascertain the ecological effects without comprehensive modelling and management strategies.



Moreover, the lack of clearly defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether suitable safeguards are established to handle potential pollution events. This procedural gap introduces significant risks, making it difficult for the competent authority to assess environmental protection measures at the crucial stage of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application under review presents an inadequate assessment of fisheries and marine life. It does not deliver a robust evaluation of either ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without consequences. The application lacks evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle additional pressure. This oversight is critical as it poses risks of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal raises considerable risks for marine species due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended duration is likely to cause disturbances across large distances, significantly affecting species such as dolphins. The application suggests a likely disturbance to a considerable portion of the local bottlenose dolphin population, yet this is downplayed without adequate supporting evidence, which raises serious concerns.

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

Additionally, the assessment fails to account for cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

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

### **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The evaluation of onshore infrastructure is fundamentally lacking and does not encompass the full range of impacts that stem from a singular integrated project. The offshore turbines and the onshore works are closely interconnected; however, they are being assessed in isolation, leading to a disjointed approach that masks the actual magnitude of environmental and socio-economic repercussions.

Among the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through fragile landscapes. These activities necessitate excavation in areas rich in deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to deliver a thorough assessment of these ramifications, hindering a complete understanding of the project's total environmental footprint.

Furthermore, the exclusion or postponement of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be evaluated collectively. However, the segmentation of offshore and onshore components results in a lack of understanding regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not confirm that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been taken, thereby leaving a significant evidential gap in terms of biodiversity conservation.

Concerns also arise regarding the carbon balance, as the disturbance of peatland releases previously stored carbon, potentially resulting in a carbon debt that

undermines the goals of renewable energy initiatives. The application does not sufficiently tackle this issue or establish that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with current land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on its deliverability and legal execution.

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

In summary, the disaggregation of project elements, the absence of a thorough assessment, and the insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, ultimately preventing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is known for its exceptionally dark skies, which are a vital aspect of the area's environmental quality, cultural identity, and tourism appeal. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment. This significant alteration is not addressed in the application, which fails to evaluate the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the increasing importance of dark skies to the area's identity and to burgeoning sectors like astro-tourism, this omission creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no consideration of the effects on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, a phenomenon that can lead to disorientation and heightened collision risks. The absence of a lighting impact assessment or a phototaxis study means the application neglects to evaluate how aviation lighting may affect these species or contribute to their mortality rates. Additionally, the ornithological assessment relies solely on daytime survey data, overlooking nocturnal activity and associated dangers. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been examined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of these nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific

doubt is not met, invoking the precautionary principle and hindering a lawful determination. Furthermore, the failure to address these issues conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time is an integral part of the environment.

In summary, the complete lack of 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 incapable of supporting a lawful determination.

## **TOURISM**

The significant growth of tourism on the Isle of Lewis, which surged from £65 million in 2017 to over £81.5 million, is critical for local employment and the economy. This sector supports more than 1,000 jobs and accounts for up to 16% of the island's economic landscape. However, the application fails to adequately assess the economic and social consequences that large-scale offshore infrastructure would have on this essential aspect of the community.

Despite acknowledging that 86% of visitors are attracted by the area's stunning scenery, there is no quantified assessment of how such infrastructure might influence visitor numbers, behaviour, or the overall economic contributions of tourism. The potential industrialisation of the seascape and the resulting degradation of environmental quality pose a serious risk to the sector's viability. The omission of a thorough evaluation of Tourism Gross Value Added and the broader economic resilience raises significant concerns about whether the proposed development would provide a net benefit or inadvertently harm a vital and thriving sector.

Moreover, the assessment does not address the crucial role that environmental quality plays in attracting tourists, particularly the appeal of unspoiled landscapes and dark skies. This oversight not only neglects the visitor experience but also overlooks burgeoning markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment leaves a critical void in understanding the potential impacts on these growing elements of the local economy.

In an island community with limited economic diversification, the lack of a thorough assessment of tourism impacts has far-reaching implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly evaluated as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the need to demonstrate net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector, failing to provide sufficient evidence for competent authorities to assess the economic consequences of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependence creates a significant evidential gap. This gap hinders a robust evaluation of economic effects and leads to the conclusion that the application is fundamentally incomplete.

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against legal obligations, national policy, and evidence standards. This application mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is presented now under a more robust policy framework that places additional emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant gaps in the evidential basis for this application. It lacks comprehensive baseline data, utilises an ambiguous design envelope, depends on unspecified mitigation measures, and omits crucial impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

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

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

There are unresolved environmental risks that remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

Additionally, the proposal would lead to substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of

dark skies, the disruption of cultural and visual relationships, and the negative impacts on tourism represent enduring effects that cannot be effectively mitigated.

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The extensive information deficiencies, along with policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused entirely.

### **Additional Comments**

Having been born and bread on the West side of the island (Shawbost) i think this proposal of a wind farm is shocking. The damage this will cause to the local enviroment, culture and wellbeing of those living in this area is unforgiveable. Unforgiveable!!

**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: 78B8535C

**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 informed by a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual impact, and environmental consequences. The application lacks a sufficient evidential foundation necessary for a lawful determination. It is characterised by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed results in an inability to fully understand the likely significant effects of the development. Furthermore, the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to lack of robust supporting evidence.

The proposal also exhibits clear and substantive conflicts with established policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not adequately demonstrate that it can meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

In light of these issues—insufficient information, undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy—the application is deemed incomplete and incapable of supporting a lawful determination. Therefore, the precautionary principle should be invoked in response to these concerns.

**MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed. This area is known for its biological



activity, yet the baseline data presented is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of marine species. Consequently, the evaluation lacks a reliable evidential basis for assessing potential impacts.

A significant concern lies with the assessment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge their active use of the coastal areas for foraging and movement. There is a notable failure to consider their core foraging range and behavioural patterns. As a result, the potential impacts of construction disturbance, noise, and increased activity on otters have not been sufficiently evaluated, undermining conclusions about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is similarly deficient. The reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The neglect of such critical data further weakens the completeness of the baseline and affects the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based on mere assumptions rather than solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and habitats.

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

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a solid evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The ornithological assessment associated with the application exhibits significant deficiencies, marked by notable gaps in evidence and contradictions that diminish its credibility. It is essential to recognise that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. The development's location within critical foraging areas and migratory pathways further

exacerbates the issue, as the assessment does not thoroughly analyse potential displacement, collision risks, or habitat loss.

A critical inconsistency within the application arises from the developer's assertion that there will be no significant adverse effects, coupled with the pursuit of a Habitats Regulations derogation case. Such a case is only necessitated when significant harm is anticipated. This contradiction raises serious questions regarding the assessment's reliability, suggesting that the conclusions drawn are unsupported by the foundational evidence.

Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling techniques brings uncertainty, particularly concerning species in steep decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underreport mortality rates, particularly in the absence of complete baseline data and a full understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses substantial risks, essentially creating an obstruction in a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of ongoing mortality within this corridor or the potential ramifications for species with relatively small global populations.

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

Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the conservation of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings inhibit a comprehensive evaluation of the impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a valid determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of community identity and cultural heritage is fundamentally insufficient and fails to recognise the West Lewis coastline as a dynamic cultural landscape where language, tradition, environment, and community are intrinsically

linked. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spaces for spiritual practice, yet the assessment mischaracterises them as static features. This oversight disregards their continued use and significance, as well as the impact of development on their settings. Consequently, the evaluation of cultural effects is incomplete and overlooks their importance in community life.

Furthermore, the application neglects intangible cultural heritage, including the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely missing from the assessment, representing a considerable omission. The cultural impact of the development cannot be adequately grasped without considering these elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity and recognised characteristics of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to uphold established principles of participation in decisions that affect cultural and environmental interests.

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

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the recognition of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory duties results in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to present a robust 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 included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This omission prevents both the public and the competent

authority from comprehensively understanding the social risks identified through the developer's own research.

Available summaries suggest that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are not merely speculative. Nevertheless, the lack of disclosure regarding the full assessment limits scrutiny of the findings and the ability to gauge their significance in the decision-making process.

There is also evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been fully integrated into the main application or adequately considered. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this scale, especially when community character and functioning may be affected. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and prevent harm, yet the available evidence points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy remains unproven.

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

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The application for large-scale turbines along the West Lewis coastline raises significant concerns regarding its impact on the local landscape, seascape, and cultural heritage. The introduction of these turbines would lead to a dominant industrial presence that fundamentally changes the area's character, known for its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This alteration to the landscape is not only substantial but also permanent and irreversible.

The visual impact of the turbines is inadequately represented in the assessment. Due to their scale and proximity to residential areas, historic sites, and popular coastal locations, the turbines would dominate views and severely impact visual amenity. This change erodes the defining qualities of naturalness and remoteness, yet the assessment fails to convey the full significance of this impact within such a sensitive landscape.

Methodological shortcomings are evident in the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not fully encapsulate the sensitivity of key cultural heritage sites and high-value landscapes. Consequently, the potential visual impact may have been understated, leading to a less reliable assessment.

Additionally, the application neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated fails to acknowledge their interdependence, resulting in an inadequate evaluation of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape threatens to sever these vital connections, disrupting the context in which heritage assets are experienced. This change represents not merely a visual impact but a wider cultural and spatial harm that remains insufficiently assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The significant scale of change proposed is incompatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a robust worst-case impact assessment undermines any assertion of compliance with established policies.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Thus, the changes brought about would be fundamental and permanent, beyond the scope of acceptable reduction through mitigation.

In summary, the assessment provided is inadequate in accurately portraying the scale of impact, the sensitivity of the receiving environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal cannot be reconciled with the protection of this significant landscape.

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life is

insufficient and does not adequately evaluate ecological or socio-economic impacts. The application does not demonstrate that the existing habitats and uses can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without any consequences. There is no evidence provided that alternative fishing grounds are available, accessible, or able to support increased pressure. This is a significant omission, as displacement could lead to overfishing in other areas and may have wider economic implications for the local fishing fleet. The impacts on fisheries and livelihoods cannot be fully understood without a clear, evidence-based assessment.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling over an extended period is likely to disturb marine life across large distances, affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Despite this, the application downplays the significance of these effects without sufficient supporting evidence.

There is also a clear inconsistency in the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment overlooks cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a robust 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 West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism appeal. The proposal



introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment. The Environmental Impact Assessment does not address the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors, which is a significant oversight given the importance of dark skies to the region and to emerging tourism sectors like astro-tourism.

Furthermore, there is a complete lack of evaluation concerning the effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The application fails to include any assessment of lighting impacts or a phototaxis study, neglecting to evaluate how aviation lighting might affect these species or contribute to increased mortality rates.

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

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse impacts beyond reasonable scientific doubt has not been met, engaging the precautionary principle and obstructing a lawful determination.

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

In summary, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

## **TOURISM**

The assessment of tourism impacts is insufficient and neglects to consider the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would produce a net economic benefit or harm an established and growing sector.

Moreover, the assessment overlooks the role of environmental quality in promoting tourism, including how unspoiled landscapes and dark skies enhance visitor experiences and cater to 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 expanding part of the local economy.

Given the limited economic diversification within the island community, the failure to evaluate impacts on tourism carries broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show adherence to National Planning Framework 4, especially concerning economic impact and the obligation to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This undermines 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 raises significant concerns regarding compliance with sustainable development principles, as mandated by statutory obligations, national policy, and evidential requirements. The application mirrors the fundamental issues that led to the previous rejection of the Lewis Wind Power proposal in 2008, highlighting the unacceptable scale of industrialisation. This current proposal is presented within a more robust policy environment that emphasises the importance of biodiversity, peatland conservation, landscape preservation, and community health.

There are substantial deficiencies within the application that undermine its evidential basis for determination. Specifically, the lack of comprehensive baseline data, the ongoing use of an undefined design envelope, and reliance on unspecified mitigation

measures all contribute to a flawed assessment. Additionally, the failure to account for key impact pathways, such as effects on nocturnal wildlife, the full extent of onshore infrastructure, and potential impacts on tourism, renders the Environmental Impact Assessment incomplete. As a result, the likely significant effects and residual impacts remain poorly understood.

Furthermore, procedural inadequacies are evident in the application. The omission of a compliant Island Communities Impact Assessment breaches the statutory duty imposed by the Islands (Scotland) Act 2018. Additionally, the failure to provide the full Social Impact Assessment constitutes a material shortcoming. Such lapses inhibit the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for consideration.

Conflicts with National Planning Framework 4 are clear, as the proposal fails to adequately protect biodiversity, natural environments, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of modelling related to tourism impacts. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties persist regarding environmental risks, which could be significant. Assessments pertaining to marine ecology, seabird populations, protected species, and marine mammals remain incomplete and occasionally contradictory. The evidential threshold necessary to eliminate the possibility of adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and hinders a lawful assessment of impact acceptability.

The proposal would bring about considerable and irreversible alterations to a notably sensitive landscape. The industrial development of the coastline facing the Atlantic, the erosion of dark skies, the disruption of cultural and visual connections, and adverse effects on tourism all signify permanent changes that cannot be adequately mitigated.

In conclusion, the application stands as both procedurally and substantively inadequate for determination. The extensive information gaps, coupled with conflicts with policy and unresolved environmental concerns, hinder the possibility of a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke relevant regulatory provisions to demand the submission of necessary information.

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

### **Additional Comments**

Dear Sir/Madam,

I am writing to formally object to the proposed offshore wind farm development off the west coast of the Isle of Lewis.

I have a strong personal connection to the island, having been born in Uigean, and I continue to return regularly with my family. This proposal is deeply concerning, not only on a personal level but due to its potential long-term environmental, cultural, and socio-economic impacts.

#### 1. Proximity to Shore and Visual Impact

The proposed development, located approximately 6 km from shore, is unusually close for a project of this scale. With turbines reaching heights of up to 338 metres, their visual presence will be dominant and unavoidable across a wide stretch of coastline. This raises serious concerns about landscape and seascape impacts, particularly in an area valued for its natural beauty and sense of remoteness.

#### 2. Impact on Marine Life

The west coast of Lewis is a known habitat and migratory route for whales, dolphins, and other marine species. The construction phase, particularly piling, is widely recognised to generate intense underwater noise, which can disturb, displace, or even injure marine mammals. There are also ongoing concerns about operational noise and vibration affecting marine ecosystems. I strongly urge that a full and precautionary assessment be undertaken regarding these risks.

#### 3. Cultural and Archaeological Significance

The proposed turbines would be visible from key heritage sites, including Callanish Stones, a prehistoric site of international importance that predates Stonehenge. The value of such sites is inseparable from their landscape setting, and industrial-scale development within sightlines risks undermining their cultural integrity and visitor experience.

#### 4. Dark Skies and Light Pollution

The Isle of Lewis is renowned for its dark skies, which are an increasingly rare natural asset. The requirement for aviation safety lighting on turbines would introduce continuous artificial light into what is currently a largely unspoilt night environment, with consequences for both wildlife and tourism.

#### 5. Socio-economic Concerns

There is significant concern that this development could negatively affect tourism, which is a key part of the local economy. The perception of industrialisation of the coastline may deter visitors seeking unspoilt landscapes. In addition, there is no clear evidence that local residents will benefit from reduced energy costs or meaningful long-term employment.

#### 6. Community Opposition

It is also important that the views of local residents are given appropriate weight.

Reports indicating substantial opposition among west side communities raise questions about whether the proposal aligns with the principles of community consent and sustainable development.

#### 7. Cumulative Infrastructure Impact

Beyond the turbines themselves, the associated onshore infrastructure required to transmit energy has the potential to further impact fragile landscapes and habitats. These cumulative effects must be fully assessed and transparently presented.

Given the scale of the proposal, the sensitivity of the location and all of the points above I strongly object to the Spiorad na Mara Offshore Wind Farm.

I look forward to hearing from you regarding my concerns and objection.

**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: B6C21E54

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

**Dear Sir/Madam**

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

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

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

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

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive, transparent, or reliable assessment of the likely environmental effects associated with the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This approach hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the final development, thus preventing both the public and the competent authority from grasping the actual extent of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed subsequently impedes any meaningful evaluation of effectiveness or 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 likely significant effects and mitigation measures are clearly defined before determination.

There are also notable evidential deficiencies, such as gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal falls short of demonstrating compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and existing gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and rigorous assessment of environmental effects, meaning that the competent authority is not positioned to make a determination based on the information available.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment related to marine ecology and protected species is fundamentally flawed and fails to provide a thorough and trustworthy understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is not



only biologically active but also highly sensitive, yet the baseline data remains incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of the species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight in this application pertains to otters, which are designated as a European Protected Species. There has been inadequate recognition and assessment of their active foraging and movement within the coastal areas. The failure to consider their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently examined. This shortcoming undermines any conclusions drawn regarding the absence of significant effects on this species.

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

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

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

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the application is significantly flawed, with considerable gaps in evidence and internal inconsistencies undermining its conclusions. Notably, the application fails to demonstrate to the required evidential standard that these species

will not be adversely affected. It is situated within key foraging areas and migratory pathways; however, the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A fundamental contradiction arises in the application where the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not adequately supported by the underlying evidence. The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in areas where baseline data is lacking and behavioural responses remain poorly understood.

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

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

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and inadequate evidence. These deficiencies obstruct a thorough 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 proposal currently under consideration presents a number of significant shortcomings regarding the assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a dynamic cultural landscape, where environment, language, tradition, and community are deeply interconnected. Instead, the application adopts a simplistic view that treats heritage as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual significance within

the community.

Particularly troubling is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice; however, the assessment reduces them to static features, neglecting their continued use and meaning as well as the effects that development may have on their surroundings. This oversight leads to an incomplete evaluation of cultural impacts and disregards the vital role these sites play in community life.

Moreover, the application does not adequately consider intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These aspects are crucial to the identity of the area but have been overlooked entirely, representing a major omission. Without addressing these elements, the true cultural impact of the development cannot be accurately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity, recognised as characteristic 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 fails to align with established principles of participation in decisions affecting cultural and environmental matters.

A notable procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this necessary assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic ramifications on the island community, thereby rendering a lawful determination impossible.

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

In conclusion, the combined failures to assess 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 properly evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The full report of the Social Impact Assessment, commissioned by the developer, has not been published, resulting in a significant evidential gap. This omission hampers both public understanding and the competent authority's ability to grasp the extent of social risks identified by the developer's own research. Available summaries suggest

that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with residents and are not speculative in nature. However, the lack of a complete assessment hinders proper scrutiny of these findings and limits the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with findings from the developer highlighting concerns over "cultural loss." Despite this recognition, these social impacts have not been adequately integrated into the main application nor given the weight they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the entire Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning are at risk. By not providing the comprehensive dataset, the application fails to present a complete evidential basis to assess the balance between benefits and harms.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence currently available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications of this non-disclosure are profound. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and confirms that the application is not underpinned by sufficient information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of visual impacts on the seascape, landscape, and cultural heritage is fundamentally inadequate and does not sufficiently convey the extent of change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately represent the scale of visual change expected. The size and proximity of the turbines would dominate views from nearby residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity while eroding the defining qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This presents a risk that the extent of visual impact has been underestimated, which undermines the assessment's reliability.

Furthermore, the assessment neglects the interconnected relationships between landscape, seascape, and cultural heritage. Notable 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. By treating these assets as isolated, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the 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 severing their connection to the natural horizon. This results not only in a visual impact but also represents a wider cultural and spatial detriment that has not been thoroughly assessed in the proposal.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, which seeks to protect natural environments and historic assets. The proposed scale of change is at odds with the requirements to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visual presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than amenable to reduction through mitigation measures.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings impede a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The evaluation of potential environmental impacts linked to construction and pollution is insufficient and lacks the necessary detail for a thorough assessment. The proposed project entails significant seabed preparation and installation activities within a challenging Atlantic setting. However, the application fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are set to be developed after consent, which hinders any meaningful appraisal of their potential effectiveness or adequacy.

The reliance on undefined future actions is especially troubling considering the delicate nature of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to contamination and sediment disruption. Although the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not adequately outline strategies for their prevention, control, or monitoring.

There is also ambiguity concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management approaches, it is impossible to gauge the ecological effects, duration, or extent of these impacts. This uncertainty extends to marine species and habitats deemed sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. The decision to delay contingency planning until after consent is granted obstructs the evaluation of whether suitable protections are in place to handle pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to scrutinise environmental protection measures at the critical point of determination.

From a regulatory standpoint, postponing essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be thoroughly assessed before consent is granted, and absent such information, a lawful decision cannot be reached. The application also fails to demonstrate adherence to 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 culminate in a materially deficient assessment. These inadequacies obstruct a rigorous evaluation of construction and pollution risks, further reinforcing the argument that the application remains incomplete.

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast support a diverse marine ecosystem and an active fishing industry. However, the application presents an assessment of fisheries and marine life that is insufficient, failing to provide a robust evaluation of ecological or

socio-economic impacts. A significant concern arises from the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This omission is critical, as displacement could lead to overfishing in other areas and may result in wider economic repercussions for the local fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and livelihoods remain inadequately understood.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling, expected to occur over an extended duration, is likely to disturb marine life across considerable distances, notably impacting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns; yet the application diminishes the significance of these effects, lacking sufficient supporting evidence.

Inconsistencies within the application further exacerbate the situation. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorisation.

The assessment also neglects to address cumulative impacts resulting from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Absent 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 perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

Ultimately, the inadequacy of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively render the assessment incomplete and unreliable. These deficiencies hinder a robust evaluation of impacts on marine life and fisheries.

## **TOURISM**

The assessment of tourism impacts within the application is inadequate and does not address the economic and social ramifications for a vital segment of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. It is noted that 86% of visitors are attracted by the scenery; however, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers,



behaviour, or the overall economic contribution of tourism.

Tourism has seen notable growth, rising from £65 million in 2017 to more than £81.5 million, and it supports over 1,000 jobs, representing up to 16% of the island's economy. Yet, the application lacks a model to examine how the industrialisation of the seascape and deterioration of environmental quality might impact Tourism Gross Value Added or the broader economic resilience of the area. Without such critical analysis, it remains uncertain whether the development would provide a net economic benefit or hinder an established and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, such as the value of unspoiled landscapes and dark skies to the visitor experience. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the impacts on a recognised and burgeoning aspect of the local economy, including nature-based tourism and astro-tourism.

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

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

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors driving visitor behaviour, and acknowledging the island's economic reliance lead to a significant evidential gap. This hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

## **SUMMARY**

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite the introduction of a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to adequately address these concerns.

A reliable evidential basis for determination is not provided in the application. There are

notable deficiencies in baseline data, reliance on an ill-defined design envelope, unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

There are procedural failures present in the application. The lack of a compliant Island Communities Impact Assessment is a violation of the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments relating to 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, which activates the precautionary principle, thus preventing any lawful determination that impacts are acceptable.

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

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

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

### **Additional Comments**

These wind farms will have a hugely negative impact on the West Side of Lewis. They will ruin the views we love. They will affect sealife, fish and birds. They will pollute the sea. Tourism will fall which will affect many on the island who rely on them. Mainly the electricity generated from them is not even going to benefit Islanders and they will be built by the company's own employees so will not even bring any jobs to the Islanders. Nothing about them is going to bring anything positive to us and they should not be built here!

**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: E64AA223

Member of the public 1818

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

**Dear Sir/Madam**

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

The application lacks a solid evidential foundation for a lawful decision. There is a critical absence of environmental data, while the baseline information provided is both limited and inconsistent. Important aspects of the proposal are still undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal presents clear and substantial conflicts with established policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The scale of the proposal is unprecedented for this location, with large turbines positioned very close to the shoreline, raising serious concerns related to landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and does not support a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and dependable account of the anticipated environmental effects associated with the proposal. The report's employment of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach obstructs a consistent application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and the competent authority from fully grasping the true extent of the environmental implications.

The application predominantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is being pursued on the premise that any environmental harm will be addressed subsequently, which hinders a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally untenable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies are clearly articulated prior to determination.

There exist substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty concerning the magnitude and significance of impacts, particularly where assertions 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, contributing to scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not fulfil the evidential standards mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invocation of the precautionary principle is particularly pertinent regarding protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, especially concerning biodiversity protection and environmental integrity, as it fails to show that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and the deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These flaws obstruct a lawful and thorough evaluation of environmental effects, leaving the competent authority ill-equipped to make an informed determination based on the information presented.

## **ASSESSMENT OF ALTERNATIVES**

The assessment of alternatives is fundamentally inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. The application does not provide a structured and reasoned comparison of realistic

alternatives based on environmental effects; instead, it offers a narrative of project evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparisons regarding alternative 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 diminished. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact mean that the absence of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to cable routing and landfall assessment, with insufficient evidence that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been implemented, relying instead on post-design measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a neglect of the established mitigation hierarchy, which prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be established that the proposal is a sustainable or policy-compliant solution.

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The marine ecology assessment related to the proposed development suffers from significant deficiencies that compromise our understanding of ecological receptors in the West Lewis coastal environment. This area is noted for its sensitivity and biological activity, yet the data provided is incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of species in this ecosystem. Consequently, the evidential basis for evaluating potential impacts is fundamentally flawed.

A critical oversight in the assessment involves otters, recognised as a European Protected Species. The application neglects to properly account for their active foraging and movement in coastal areas. This lack of attention to their core foraging range and behavioural patterns means that the possible impacts from construction disturbance,

noise, and increased human activity have not been thoroughly assessed. Such omissions undermine any assertions regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks is inadequate, with a heavy reliance on aerial surveys that introduce significant bias in detection, particularly under typical Atlantic conditions. This methodology is likely to lead to an underestimation of their presence in the waters concerned, especially in light of established land-based observations that indicate frequent use of these areas. The failure to consider such pertinent data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

The methodological flaws present in the assessment suggest that conclusions regarding negligible or non-significant effects are founded on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which should encompass seasonal variations and broader ecosystem interactions. This gap creates a level of uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or the standards set by National Planning Framework 4, as protected species have not been sufficiently identified or assessed. This introduction of uncertainty prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately highlighting the lack of a sufficient evidential foundation for the application.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application proposes the development of turbines situated within a key migratory corridor on the west coast of the Isle of Lewis, an area that is home to internationally significant seabird populations, many of which are already experiencing decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The assessment fails to adequately demonstrate that these seabird species will not be adversely affected, particularly regarding important foraging areas and migratory pathways. It does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A notable contradiction arises within the application, as 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 doubts about the reliability of the



assessment, suggesting that the conclusions drawn are not supported by the underlying evidence. Additionally, the assessment lacks adequate evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial significance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor introduces an additional and substantial risk, effectively acting as a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies further reflect non-compliance with 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 affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to meet the statutory requirements necessary for a favourable determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment inadequately addresses cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising heritage as an evolving entity with social, cultural, and spiritual significance, the application simplifies it into isolated, static assets.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places for burial and spiritual practice. The assessment categorises these sites as static features, ignoring their continued relevance and the impact that development could have on their settings. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Furthermore, the assessment fails to account for intangible cultural heritage, such as

the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity yet are completely overlooked, which represents a significant gap in the analysis. Without considering these aspects, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as Indigenous, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and disregards well-established principles that emphasise participation in decisions impacting cultural and environmental matters.

Moreover, a critical procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment obstructs the competent authority from fulfilling its legal obligation to evaluate social, cultural, and economic impacts on the island community. This alone undermines the lawfulness of the determination.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices clearly diverge from required policy standards.

Collectively, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to offer a robust foundation for understanding the genuine cultural cost associated with it.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency surrounding the Social Impact Assessment commissioned by the developer raises serious concerns regarding social impacts, health, and wellbeing. Although focus groups with local residents were conducted, the full report has not been made available. This absence represents a substantial evidential gap, preventing both the public and the competent authority from fully grasping the social risks identified by the developer's own research.

Summaries that have been released indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. However, without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which restricts the understanding of their significance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with

the developer's own findings noting instances of "cultural loss." Despite this recognition, these implications have not been adequately addressed in the main application or given the necessary consideration. The decision to withhold the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency in transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning may be at stake. By failing to provide the full dataset, the application lacks a solid evidential foundation needed for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet the evidence at hand indicates that adverse effects are already present and not fully disclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications of these issues are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate and does not properly address the extent of the anticipated change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would impose a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to accurately depict the magnitude of the anticipated visual change. Given their scale and proximity, the turbines would dominate the views from residential areas, historic locations, and frequently visited coastal sites. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant cultural heritage sites and high-value landscapes. This raises the possibility that the assessment may have understated the magnitude of visual impact, thereby compromising the overall reliability of the evaluation.

A significant oversight is the failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape, interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their context and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the preservation of natural places and historic assets. The extent of change proposed is inconsistent with the obligation 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 requirements.

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

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment of construction and pollution risks is notably deficient. The proposal entails significant seabed preparation and installation work in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that would only be prepared after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures raises concerns, particularly given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats, which are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

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

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent; without this information, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The assessment regarding fisheries and marine life lacks depth, failing to deliver a thorough evaluation of the ecological and socio-economic impacts involved. The region off the West Lewis coast is home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not prove that these valuable habitats and activities can be preserved or maintained without considerable disruption.

One significant concern is the presumption that fishing activities can be relocated without repercussions. The submission does not provide any evidence to suggest that alternative fishing grounds are available, accessible, or able to bear additional pressure. This oversight is critical, as the risk of displacement could lead to overfishing in other areas and result in broader economic ramifications for the local fishing fleet.

Without a precise and evidence-based examination, the consequences for fisheries and the livelihoods dependent on them remain unclear.

The proposal also presents serious risks to marine species, especially due to the underwater noise generated during construction. Extended periods of high-energy hammer piling are expected to cause disturbances over considerable distances, adversely impacting species like dolphins. There are significant concerns regarding the predicted disturbance to a considerable portion of the local bottlenose dolphin population; nonetheless, the application minimizes these concerns without adequate supportive evidence.

Additionally, there exists a notable inconsistency within the application, which acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction undermines the validity of the assessment and raises questions about adherence to the Habitats Regulations, especially in scenarios where harm is predicted to such a degree that it requires legal authorisation.

The assessment also neglects to account for cumulative impacts stemming from various pressures, such as 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 adequately show that the development can coexist with current marine users or prevent unacceptable repercussions on marine biodiversity, hindering any conclusion that the proposal embodies sustainable development.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions present in the application culminate in an assessment that is incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The proposed project presents significant concerns regarding its assessment and the implications of its onshore infrastructure, which are inadequately addressed in the application. The offshore turbines and onshore works are interconnected, yet the assessment treats them as separate entities. This fragmented analysis obscures the true scale of environmental and socio-economic impacts, failing to recognise the project's full extent.

Critical onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, as well as the necessary access infrastructure through sensitive landscapes. Notably, this

construction entails excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders the understanding of the project's overall environmental footprint.

The application also falls short in evaluating cumulative effects due to the exclusion or deferral of onshore impact assessments. The Environmental Impact Assessment process mandates a holistic approach to understanding all project components; however, the separation of offshore and onshore evaluations results in an incomplete picture of the combined effects on peatlands, habitats, and local communities.

Sensitive habitats, such as machair systems and peatland environments, face considerable risks and are subject to policy protection. The application fails to adequately assess potential impacts on these habitats or to outline appropriate avoidance measures, creating a significant evidential gap concerning biodiversity protection.

Furthermore, there are concerns regarding carbon balance, as disturbances to peatland may release stored carbon, thereby potentially creating a carbon debt. This contradicts the goals of renewable energy development, and the application does not sufficiently address this issue or affirm that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land presents additional challenges, introducing conflicts with existing land use and legal rights. The application lacks evidence of the initiation of necessary consents or processes, raising doubts about its deliverability and lawful execution.

From a policy standpoint, the disjointed assessment of the project and the failure to safeguard peatlands, habitats, and land use interests are in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further erodes the credibility of the application.

In summary, the separation of project components, lack of comprehensive impact assessments, and insufficient evidence regarding environmental and land use consequences render this aspect of the application incomplete and unreliable, thereby obstructing lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The Environmental Impact Assessment is missing a crucial evaluation of dark skies and nocturnal wildlife, representing a serious oversight. The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposed introduction of permanent red aviation lighting would create a pervasive “wall of light” effect that could transform the night-time environment significantly.



The lack of analysis regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors is particularly alarming, especially considering the significance of dark skies to the area's identity and the growth of sectors such as astro-tourism. This gap in the environmental assessment is critical as it fails to address how such lighting may disrupt the landscape and overall environment.

Moreover, the application neglects to assess the potential impacts on nocturnal wildlife. Species that include Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, as it can lead to disorientation and increased risk of collision. Without any lighting impact assessment or studies on phototaxis, the application does not evaluate how aviation lighting might affect these species or contribute to increased mortality rates.

This critical omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated threats. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this concern has not been addressed. The absence of night-time specific data presents a significant gap in understanding the ecological impacts of the proposal.

In the absence of an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard to demonstrate that no adverse effects exist beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, the omission contravenes the National Planning Framework 4 concerning the protection of natural environments and the quality of the ecosystem. This disregard also weakens the comprehensive assessment of landscape and seascape impacts, given that the character of night-time is an essential component of the environment.

Overall, the lack of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analyses makes the application incomplete and insufficient to support a lawful determination.

## **TOURISM**

The evaluation of tourism impacts within the application is severely lacking and neglects to address the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's stunning coastline, almost untouched landscape, dark skies, and the unique sense of remoteness it offers. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a measured assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or their overall economic contribution to

the region.

The growth of tourism has been remarkable, increasing from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and accounts for as much as 16% of the island's economy. Nonetheless, the application does not explore how the potential industrialisation of the seascape and the deterioration of environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this crucial analysis, it remains unclear whether the proposed development would provide a net economic benefit or damage a vital and flourishing sector.

Moreover, the assessment overlooks the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for enhancing visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the potential impacts on a sector that is increasingly important to the local economy.

For an island community with limited economic diversification, the inadequate consideration of tourism impacts carries broader implications for employment, local enterprises, and the sustainability of the community. The absence of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a key growth area and fails to provide enough evidence for the competent authority to evaluate the economic repercussions of the proposal.

Ultimately, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and acknowledging the economic dependence of the island culminate in a significant evidential gap. This deficiency hampers a thorough assessment of the economic effects and leads to the conclusion that the application is incomplete.

## **SUMMARY**

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards of sustainable development as mandated by statutory duties, national policy, and evidential requirements. This proposal mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. It is now being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided for the assessment of this application is incomplete and

unreliable. There exist critical deficiencies in baseline data, the proposal continues to employ an undefined design envelope, and it relies on unspecified mitigation measures. Additionally, there is a notable omission of essential impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate and does not facilitate a thorough understanding of likely significant effects or residual impacts.

Procedural failures are evident throughout the application process. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the incomplete disclosure of the Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for consideration.

This proposal is also at odds with National Planning Framework 4. It fails to establish protections for biodiversity, natural places, and cultural heritage; does not demonstrate that health and wellbeing impacts are acceptable; and lacks evidence of a net economic benefit due to the failure to model tourism impacts. The cumulative effects of both offshore and onshore components have not been adequately assessed, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations related to marine ecology, seabirds, protected species, and marine mammals are both incomplete and, at times, internally inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and obstructing a lawful determination of impact acceptability.

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

In summary, the application is unfit for determination both procedurally and substantively. The multitude of information deficiencies, coupled with conflicts with policy and outstanding environmental uncertainties, precludes a lawful and evidence-based decision. The competent authority is therefore urged to either refuse consent based on these grounds or to employ the appropriate regulatory provisions to mandate the submission of the necessary missing information.

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

### **Additional Comments**

I object in the strongest possible terms to the proposed Spiorad na Mara offshore wind development.

This proposal represents an unacceptable level of environmental risk. It threatens internationally important seabird populations through collision and displacement, based on modelling that is inherently uncertain and does not justify the scale of impact.

The cumulative effects of this and other developments have not been credibly addressed. Approving this project without a clear understanding of long-term ecosystem consequences is reckless.

The risks to marine mammals from construction noise are significant, and proposed mitigation measures are insufficient and unreliable in practice., and there are at least 1,000 marine mammals living in this area, as noted in Northlands own survey documentation.

The impact on local fisheries is being understated. This development risks displacing livelihoods and damaging a long-established and vital part of the local economy, without enforceable protections.

The visual impact alone is substantial, as these are sea turbines that are massive and designed for far out at sea, and not for near populated communities "only 3 miles from a well populated shoreline"

Turbines of this size and proximity will industrialise a largely unspoiled landscape, causing permanent and irreversible harm to the character of the area, and at low light, fog, har, or darkness there will be constant flashing powerful navigation lights on each turbine tgat will be seen for many miles, affecting the darkskies and tgd night environment.

Northland have by design itentionally held poorly advertised meetings, with limited accessability, to keep the knowledge of this project and thus minimal objections.

This sea area was due to be assigned as a MPA, marine protected area, and this was dropped when these proposed planned windfarm projects came to light.

There is no compensation for people who own homes in the area, as when such a windfarm is established the salable value of a home drops by about 15%, and makes the home harder to sell.

This application relies on assumptions, incomplete evidence, and optimistic projections. It does not meet the standard required for a development of this magnitude.

It should be refused.

**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: 4F4494A8

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental consideration, cultural impact, and procedural adherence. The proposed development is situated off the west coast of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The application cannot be deemed to comply with the evidential threshold mandated under the Habitats Regulations, which necessitates the exclusion of adverse effects beyond reasonable scientific doubt. This situation calls for the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity. It remains unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed subsequently obstructs any meaningful evaluation of the effectiveness of these measures or an 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 regime, which mandates the clear establishment of likely significant effects and mitigation before determination.

Additionally, there are considerable evidential deficiencies present, such as gaps in baseline data and limitations in methodology, which are coupled with a reliance on assumptions instead of site-specific evidence. This results in ambiguity regarding the scale and significance of impacts, especially when negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

The Environmental Impact Assessment Report is materially deficient, failing to furnish a full, transparent, or reliable account of the probable environmental effects of the proposal. The employment of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, injects significant uncertainty into the process and inhibits a consistent application of a worst-case scenario. This undermines the integrity of the assessment and obscures the true extent of environmental effects, preventing both public understanding and competent authority assessment.

In summary, the combination of reliance on an undefined design envelope, absence of specific mitigation measures, and insufficient baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority incapable of determining the application based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, as it does not provide a structured, reasoned comparison of realistic alternatives based on environmental effects. Instead, it presents a narrative account of project evolution, which does not adequately demonstrate that less harmful



options have been properly identified, assessed, and selected over more damaging solutions.

There is no evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where impacts related to visual, ecological, and coastal issues would likely be mitigated. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, where there is a lack of evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis indicate that mitigation by design has not been considered, with the proposal relying instead on post-design mitigation measures.

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

From a policy standpoint, this lack of thoroughness undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is significant, 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 presents significant shortcomings, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal area. This environment is both highly sensitive and biologically active, yet the data on existing conditions is insufficient, and the methodologies used do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A notable gap in the analysis pertains to otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active usage of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural patterns means that the potential impacts stemming

from construction disturbance, noise, and increased activity remain inadequately assessed. This significant omission casts doubt on any conclusions drawn regarding the absence of noteworthy effects on this species.

There are also considerable flaws in the assessment of basking sharks, as the reliance on aerial surveys introduces a substantial bias in detection, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are frequented by such species. The failure to incorporate or give proper consideration to this data leads to an incomplete baseline, further undermining the reliability of the conclusions made.

The limitations in methodology result in conclusions of negligible or non-significant effects being based on assumptions rather than rigorous evidence. The lack of adequate baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the true extent of risk to marine species and their habitats.

From a regulatory standpoint, the application does not align with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not correctly identified or assessed protected species. The degree of uncertainty raised prevents the elimination of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application fails to provide sufficient evidence that internationally important seabird populations, including those associated with protected sites like the Lewis Peatlands and St Kilda, will not be adversely affected. The west coast of the Isle of Lewis is home to many seabird species that are already in decline, yet the assessment does not robustly demonstrate, to the necessary evidential standard, that these species will be safeguarded. The reliance on modelling approaches, particularly for species in severe decline such as Kittiwakes and Fulmars, introduces uncertainty. The methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and the behavioural responses of these birds are not fully understood.

Significantly, the siting of turbines within a recognised migratory corridor poses an additional risk by creating a barrier within a primary flight path utilised by species

travelling between the United Kingdom and Iceland. The assessment does not adequately evaluate the long-term implications of sustained mortality in this corridor, nor does it consider the potential effects on species with relatively small global populations. The shortcomings in the assessment raise serious concerns about the reliability of the conclusions drawn.

A fundamental contradiction within the application sees the developer asserting that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency undermines the validity of the assessment and indicates that the conclusions presented do not align with the evidence that supports them.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, hindering a lawful conclusion in favour of consent.

Moreover, the identified deficiencies illustrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. Taken as a whole, the assessment is unreliable, marred by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These flaws preclude a thorough evaluation of the impacts, reinforcing the conclusion that the application does not satisfy the statutory requirements for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The proposal critically underestimates the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. It adopts a simplistic approach, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual relevance within the community.

Particularly troubling is the inadequate treatment of significant cultural sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These are not just static features; they are vital spaces for burial and spiritual practice. However, the assessment neglects to consider their continued use and meaning, as well as the development's potential impact on their surrounding environment. This failure leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Moreover, the application overlooks intangible cultural heritage, including the Gaelic language, various traditions, and the enduring relationship between the community and the coastal environment. These elements are integral to the area's identity and are entirely omitted from the assessment, representing a critical gap. Without accounting

for these factors, the cultural ramifications of the development remain inadequately explored.

Concerns also arise around community rights and the necessity for engagement. The Gaelic-speaking population embodies a unique cultural identity with recognised traits of an Indigenous People, yet no process of Free, Prior and Informed Consent has been conducted. This lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental matters.

Additionally, the absence of a compliant Island Communities Impact Assessment is a major procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission in itself precludes a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially concerning the safeguarding of historic assets and locations. The neglect to address both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a blatant disregard for policy requirements.

In summary, the neglect to evaluate living heritage, intangible cultural value, community rights, and statutory responsibilities results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application fails to deliver a solid foundation for understanding the true cultural cost associated with the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is critical and has severe implications for the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This failure to disclose vital information creates a significant evidential gap, preventing both the public and the competent authority from understanding the complete range of social risks highlighted by the developer's own research.

Available summaries show that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and are not based on speculation. However, the lack of access to the full assessment hinders proper scrutiny of these findings, limiting the capacity to assess their importance in the decision-making process.

Moreover, evidence indicates that the proposal is viewed as a direct threat to community identity and cohesion, with findings pointing to a potential "cultural loss."

Yet, these impacts have not been adequately incorporated into the primary application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency severely undermines the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health implications for developments of this magnitude, especially when community character and function may be at stake. Without the full dataset, the application does not provide a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application is unable to demonstrate its compliance with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and mitigate harm, yet the evidence currently available suggests existing adverse effects that remain undisclosed. In light of the absence of the complete assessment, compliance with this policy is unprovable.

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

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks adequate supporting information.

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of the potential impacts on seascape, landscape, and visual aspects is fundamentally lacking and does not truly capture the extent of the changes or the delicate nature of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong feeling of remoteness. The proposal to install large-scale turbines near the shoreline would introduce a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible change in the landscape.

Moreover, the application fails to adequately portray the extent of the visual alterations expected. Due to their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual

viewpoints. There is evidence suggesting that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This poses a risk that the severity of the visual impact has been minimised, calling into question the reliability of the assessment.

Another notable shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that has not been sufficiently examined within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The extent of the changes is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

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

## **CONSTRUCTION AND POLLUTION RISKS**

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

This reliance on undefined future measures raises particular concern given the

sensitivity of the receiving environment. The coastline of West Lewis supports clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient details on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application prevents the evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory viewpoint, the deferral of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment materially deficient. These shortcomings obstruct a robust evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The assessment regarding fisheries and marine life is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a varied marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these important habitats and uses will be safeguarded without substantial disruption.

A notable concern is the presumption that fishing activity can be displaced without repercussions. There is no evidence provided that indicates alternative fishing grounds are available, easily accessible, or capable of withstanding additional pressures. This absence of information is critical, as such displacement poses risks of overfishing in other areas and could result in broader economic consequences for the local fishing



fleet. Without a detailed and evidence-based analysis, understanding the impacts on fisheries and local livelihoods remains elusive.

Furthermore, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances across extensive areas, affecting species like dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Nevertheless, the application minimises the significance of these effects without adequate supporting evidence.

There exists a contradiction within the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are described as negligible. This inconsistency undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures such as 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 adherence to the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which prevents the conclusion that the proposal constitutes sustainable development.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

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

Among the onshore elements are cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application fails to provide a thorough assessment of

these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

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

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

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

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

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

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

## **TOURISM**

The analysis regarding the impacts on tourism within the application is fundamentally lacking, failing to assess the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism heavily relies on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, the application provides no quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

The significant growth of tourism is evident, with revenue rising from £65 million in 2017

to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application neglects to model the potential effects of the seascape's industrialisation and the degradation of environmental quality on Tourism Gross Value Added or broader economic resilience. Without such a thorough analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or detract from an already established and expanding sector.

Furthermore, the assessment does not take into account the critical role of environmental quality in enhancing the tourism experience. The significance of unspoiled landscapes and dark skies for visitor satisfaction and the growing markets for nature-based tourism and astro-tourism is overlooked. The absence of a Dark Skies Assessment exacerbates this issue, creating a notable void in the understanding of impacts on a recognised segment of the local economy.

In a context where the island community faces limited economic diversification, the lack of a thorough evaluation of tourism impacts carries broader implications for employment, local enterprises, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been duly considered as mandated by the Islands (Scotland) Act 2018.

On a policy level, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to establish a net benefit. It also contradicts strategic goals that highlight tourism as a priority growth sector, lacking adequate evidence for the competent authority to assess the economic consequences of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, examining environmental factors that influence visitor behaviour, and acknowledging the island's economic reliance culminate in a substantial evidential gap. This gap obstructs a rigorous evaluation of economic effects and reinforces the conclusion that the application remains 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 its entirety.

### **Additional Comments**

The N4 scheme is hugely detrimental to the wellbeing of the people of the locality, economically, culturally and health wise. These issues have not been fully assessed by

the developer and the concerns of the communities affected have not been fully acknowledged or mitigated by the developer. They have not addressed the damage to the fragile tourist economy, Gaelic culture and identity or the right of the island community to have a bigger say and ownership of the resources on their doorstep. In terms of marine life the N4 scheme would have long-term effects on aspects like the returning humpback whale population and the protected marine and avian species that live and migrate through the area. The scheme is ill sited and designed to maximise profit rather than make sense for the people of the island or its diverse ecosystems. In short it is an ill conceived extractive scheme, sited too close to land based on a piece of seabed undersold without consent from the community affected. It should not receive planning

**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: 545B695D

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

**Dear Sir/Madam**

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

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

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

Moreover, the unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report lacks completeness and does not provide a full or reliable account of the likely environmental effects of the proposal. It employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent assessment of worst-case scenarios. As a result, the integrity of the assessment is undermined, leaving both the public and the competent authority unable to grasp the true extent of environmental effects.

Consent for the application is sought based on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach postpones the evaluation of environmental harm, which prevents any meaningful assessment of effectiveness or residual impacts. Deferring key information to post-consent stages is procedurally inappropriate and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also considerable evidential gaps, including insufficient baseline data and methodological limitations, along with reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are concluded without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory requirements.

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

The combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The application proposes a development that is severely lacking in a thorough assessment of alternatives, which is crucial under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives with respect to their environmental consequences, it presents a narrative regarding the evolution of the project. This method does not adequately show that options which could potentially cause less harm have been appropriately identified,



evaluated, and chosen over more damaging alternatives.

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

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

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

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species fails to provide a complete understanding of ecological receptors within the West Lewis coastal environment, which is a sensitive and biologically active marine system. The baseline data is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, this lack of comprehensive data undermines the assessment's reliability for evaluating potential impacts.

A significant oversight is the inadequate recognition and assessment of otters, which are a European Protected Species. The application does not properly address their active use of coastal areas for foraging and movement. This omission means that the potential effects of construction disturbances, noise, and increased human activity have not been sufficiently evaluated, thereby questioning the conclusions drawn about

the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduce significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to consider such critical data results in an incomplete baseline and detracts from the reliability of the conclusions presented.

The methodological shortcomings lead to assertions of negligible or non-significant effects based on assumptions rather than robust evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This contributes to uncertainty regarding the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainties introduced prevent the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these conditions, lawful consent cannot be granted.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a solid evidential foundation.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment's deficiencies are significant and demonstrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The proposal is in direct conflict with national policy, as it cannot adequately show that internationally important seabird populations will remain unaffected.

The application fails to meet the evidential threshold required to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which prohibits a lawful conclusion in favour of consent.

The assessment lacks sufficient evidence concerning the seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully taken into account, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe decline, including

Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully understood.

Moreover, the siting of turbines within a recognised migratory corridor poses a significant risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

There exists a fundamental contradiction within the application; the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence presented.

Overall, the assessment is fundamentally flawed, characterised by internal inconsistency, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for a valid determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

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

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

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

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

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

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

### **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 seascape, landscape, 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.

## **CONSTRUCTION AND POLLUTION RISKS**

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

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

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application hinders the

evaluation of whether proper safeguards are established to address pollution incidents. This approach introduces procedural risk and weakens the ability of the competent authority to review environmental protection measures before making a determination.

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

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

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life is insufficient and does not adequately evaluate ecological or socio-economic impacts. The application does not demonstrate that the existing habitats and uses can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without any consequences. There is no evidence provided that alternative fishing grounds are available, accessible, or able to support increased pressure. This is a significant omission, as displacement could lead to overfishing in other areas and may have wider economic implications for the local fishing fleet. The impacts on fisheries and livelihoods cannot be fully understood without a clear, evidence-based assessment.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling over an extended period is likely to disturb marine life across large distances, affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Despite this, the application downplays the significance of these effects without sufficient supporting evidence.

There is also a clear inconsistency in the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment overlooks cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of

fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

### **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the onshore infrastructure is significantly lacking and does not consider the full range of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are fundamentally interconnected; however, they are being evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation close to Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically important habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed collectively, yet the disconnection of the offshore and onshore elements prevents a full understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This results in a distinct evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or procedures have been initiated, which raises concerns regarding the feasibility and lawful execution of the project.



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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The absence of an assessment regarding 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 vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect on the western horizon, which would fundamentally change the night-time environment.

Moreover, the application fails to evaluate how this lighting would impact visual amenity, landscape character, and the experiences of both residents and visitors. This lack of analysis is particularly troubling given the crucial role dark skies play in the region's identity and the growing sectors of tourism like astro-tourism. Consequently, the omission of these impacts creates a clear gap in the overall landscape and environmental assessment.

Of even greater concern is the absence of any evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, thereby neglecting to assess the potential effects of aviation lighting on these species and their mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been considered. The absence of specific night-time data creates a significant gap in understanding the ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse consequences. The evidential standard needed to rule out negative effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time settings is a fundamental aspect of the environment.

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

## **TOURISM**

The proposal under review significantly lacks a thorough assessment of tourism impacts, which are crucial for understanding the economic and social consequences for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are fundamental to the tourism sector. While the application notes that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure could affect visitor numbers, behaviour, or the overall economic contribution to the local economy.

Tourism on the Isle of Lewis has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, which represents up to 16% of the island's economy. However, the application neglects to model the potential impacts of seascape industrialisation and the associated loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without such an assessment, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise this established and expanding sector.

The application also overlooks the critical role of environmental quality in supporting tourism, particularly regarding unspoiled landscapes and dark skies, which enhance the visitor experience and foster emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, creating a significant gap in understanding the potential impacts on a sector that is recognised as increasingly important to the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set forth by 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 obligation to show a net benefit. It conflicts with strategic objectives

that position tourism as a priority growth sector and lacks the necessary evidence for the competent authority to accurately assess the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and considering the economic dependencies of the island culminate in a significant evidential gap. This deficiency hinders a robust evaluation of the potential economic effects and reinforces the conclusion that the application remains incomplete.

## SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the criteria for sustainable development when evaluated against legal obligations, national policies, and evidential requirements. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is put forth under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial shortcomings in the evidential basis for determining the application. Essential baseline data is lacking, there is ongoing reliance on an ambiguous design envelope, unspecified mitigation measures are cited, and key impact pathways are excluded, including those relating to nocturnal wildlife, comprehensive onshore infrastructure, and the tourism sector. As a result, the Environmental Impact Assessment remains incomplete and fails to provide a thorough understanding of the significant effects or residual impacts likely to arise.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory obligations under the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment is a critical omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also in direct opposition to 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 net economic benefits due to insufficient tourism impact analysis. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential standards needed to dismiss adverse effects beyond reasonable scientific doubt have not been satisfied, invoking

the precautionary principle and preventing a lawful determination that impacts are acceptable.

Additionally, the proposal threatens to bring about significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual ties, and negative impacts on tourism represent lasting consequences that cannot be mitigated to an acceptable degree.

In conclusion, the application is fundamentally inadequate both procedurally and substantively for determination. The breadth of information deficiencies, along with policy discrepancies and unresolved environmental concerns, obstruct a lawful and evidence-based decision. The competent authority is urged to either reject the application on these grounds or utilise the appropriate regulatory measures to demand the missing information.

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

### **Additional Comments**

It is not for me that I submit this objection but the countless lives who will be affected by this development. Those lives are not only human but the vast biodiversity that exists, inhabits and currently thrives as best they can alongside humanity's ever encoaching behaviour stifling the last sanctuaries remaining in this, becoming ever more sparse, empty world. Please leave the world some semblance of nurturing existence.

**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: D4FFF201

**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 frameworks. A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The design, proximity, and scale of the proposal raise serious questions about its alignment with statutory obligations, national policies, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful decision. There are gaps in critical environmental data, the baseline information provided is both limited and inconsistent, and many crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to allow for a comprehensive understanding of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack robust evidential support.

There are evident and significant policy discrepancies as well. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment guidelines, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate considerations, and environmental integrity are achievable. Such discrepancies directly impact the statutory tests needed for consent and compromise the ability of the competent authority to determine the proposal's acceptability under policy frameworks.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot substantiate a lawful determination. In light of these factors, the precautionary principle is imperative.

**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.

## **ASSESSMENT OF ALTERNATIVES**

The assessment of alternatives is significantly lacking and does not fulfil the statutory requirements outlined in the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of viable alternatives based on their environmental effects, instead offering a narrative account of the

project's evolution. This method does not demonstrate that less harmful options have been thoroughly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such analysis prevents any conclusion that the proposed siting is indeed the least damaging option.

The shortcomings extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been properly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation through design has not been effectively employed, with an overreliance on post-design mitigation measures instead.

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

From a policy standpoint, this deficiency calls into question compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment of marine ecology and protected species is inadequate and does not furnish a comprehensive or dependable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient and the methodologies utilised do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment falls short of providing a solid evidential foundation for evaluating the impacts of the proposed developments.

A significant oversight involves otters, which are classified as a European Protected Species. The application inadequately acknowledges and evaluates the active utilisation of coastal areas by otters for foraging and movement. Without a proper



assessment of their core foraging ranges and behavioural patterns, the potential consequences of construction disturbances, noise, and increased activity have not been thoroughly examined. This lack of consideration undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks is compromised by the reliance on aerial surveys, which introduce considerable detection bias, particularly under 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 utilisation of these waters. By failing to incorporate or adequately evaluate such data, the assessment produces an incomplete baseline, which diminishes the reliability of its conclusions.

The methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers any meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates significant uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not accurately identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions collectively undermines the reliability of the assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks an adequate evidential basis.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the development application is materially flawed and fails to demonstrate to the required evidential standard that these species will not be adversely affected. The application does not adequately evaluate key foraging areas and migratory pathways, neglecting to consider the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction within the application arises as the developer concludes that there are no significant adverse effects, while simultaneously presenting a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises concerns regarding the reliability of the

assessment, indicating that the conclusions drawn are unsupported by the underlying evidence. The assessment lacks sufficient evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and does not fully account for the importance of these feeding grounds. Moreover, the reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses remain inadequately understood.

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

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

These deficiencies also indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, which impede a robust evaluation of impacts and support the conclusion that the application does not fulfil the statutory requirements necessary for determination.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The assessment of social impacts, health, and wellbeing associated with the proposed development lacks necessary transparency, leading to a materially deficient evaluation. Although the developer commissioned a Social Impact Assessment that involved focus groups with local residents, the full report remains unpublished. This situation creates a significant evidential gap, which restricts both public insight and the competent authority's ability to fully comprehend the extent of the social risks identified by the developer's research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed project. These impacts stem from direct engagement and are therefore grounded in reality, not mere speculation. The inability to disclose the complete assessment inhibits proper examination of the findings and limits the capability to evaluate their significance in the decision-making process.

Furthermore, the proposal appears to threaten community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, such impacts have not been adequately integrated into the main application or considered with the seriousness they warrant. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs that the development may impose.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. The failure to provide the full dataset means the application does not offer a comprehensive evidential basis necessary to assess the balance between potential benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence available suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it cannot be shown that compliance with this policy is met.

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

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of current adverse impacts, renders the overall assessment incomplete and unreliable. This scenario obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

## **CONSTRUCTION AND POLLUTION RISKS**

The assessment of construction and pollution risks lacks completeness, failing to provide the necessary detail to evaluate potential environmental effects. The project entails significant seabed preparation and installation in a high-energy Atlantic setting, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be established after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures raises particular concerns due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. The application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills but lacks adequate detail on how these issues will be

prevented, controlled, or monitored.

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

The situation is further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are available to address pollution incidents. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated before consent is granted, and the lack of such information precludes a lawful determination. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the proposed project lacks completeness, particularly concerning the onshore infrastructure, which is critical to understanding the full range of impacts associated with this integrated project. The offshore turbines and onshore works are fundamentally interconnected, yet the current assessment treats them separately. This fragmented approach obscures the true scale of the environmental and socio-economic consequences.

The onshore components encompass the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and necessary access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to provide a comprehensive assessment of the impacts on these environments, leading to an incomplete understanding of the overall environmental footprint of the project.

Moreover, the exclusion or deferment of onshore impact assessments prevents a

thorough evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively; however, the division between offshore and onshore elements results in an inadequate understanding of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that the impacts on these habitats have been fully evaluated or that suitable 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, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not show that the necessary consents or processes have been initiated, calling into question the project's deliverability and legality.

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

In summary, the disjointed evaluation of project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts render this part of the application incomplete and untrustworthy, obstructing lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The absence of any assessment regarding dark skies and nocturnal wildlife is a glaring omission within the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which are vital not only for environmental quality but also for cultural identity and tourism. The proposed installation of permanent red aviation lighting would create a continuous 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, or the experiences of both residents and visitors. This is particularly significant given the increasing importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. Such a failure creates a substantial gap in the overall landscape and environmental evaluation.

Equally concerning is the lack of assessment regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including potential increases in mortality, have not been considered.

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

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

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

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

## **TOURISM**

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

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

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

In a community with limited economic diversification, neglecting to assess tourism impacts has far-reaching consequences for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, which is a requirement under the Islands (Scotland) Act 2018.

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

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

## SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the same central issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This new proposal is now presented within a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

A complete and reliable evidential basis for determination is not provided. There are notable gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural failures are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to disclose the entire Social Impact Assessment constitutes a serious omission. These shortcomings hinder the competent authority's



ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal directly contradicts National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been thoroughly evaluated, 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 contain internal inconsistencies. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and impeding 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, disruptions to cultural and visual relationships, and impacts on tourism would result in permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either reject the application on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information.

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

**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: 0681216D

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

**Dear Sir/Madam**

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns regarding this proposal stem from its scale, proximity, and design, which raise fundamental issues about its alignment with statutory requirements, national policy, and sustainable development principles.

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

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, undermining the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines planned in close proximity to the shoreline. This introduces significant concerns related to landscape capacity, visual dominance, and overall environmental impact. When considering the absence of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive and transparent evaluation of the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope,

lacking commitment to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the effective application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that is ultimately realised, leading to a situation where both the public and the competent authority are left unaware of the true extent of the environmental effects.

A concerning aspect of the application is its heavy dependence on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought with the assumption that environmental harm will be managed later, which severely limits any thorough evaluation of the measures' effectiveness and assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated before any decision is made.

Moreover, there are considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without strong supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that fails to meet statutory requirements.

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

Overall, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

## **ASSESSMENT OF ALTERNATIVES**

The Environmental Impact Assessment regime's requirements for assessing alternatives have not been met, resulting in a materially inadequate submission. The application fails to provide a structured and reasoned comparison of realistic alternatives based on their environmental impacts. Instead, it offers a narrative of

project evolution that does not establish that less harmful options were properly identified, assessed, and selected over more damaging ones.

There is no transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. The West Lewis coastline's sensitivity and the critical nature of proximity to the shore in assessing impacts highlight the necessity of this analysis. Its absence prevents any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the evaluation of cable routing and landfall assessments, lacking sufficient evidence that alternative routes have been explored to mitigate impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that the application does not employ mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This shortcoming reflects a disregard for the established mitigation hierarchy, impeding the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The lack of a thorough assessment of alternatives undermines the proposal's sustainability and policy compliance.

From a policy standpoint, these deficiencies contradict the principles laid out in National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, reinforcing the conclusion that the application has not been sufficiently evaluated to warrant lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The proposed assessment of marine ecology and protected species exhibits significant deficiencies that undermine the reliability of its findings concerning ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the data provided is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of key species, resulting in an absence of a sound evidential basis for evaluating potential impacts.

One critical shortfall in the assessment is the failure to adequately acknowledge and evaluate the active use of coastal areas by otters, a species protected under European law, for both foraging and movement. This oversight neglects to consider their core foraging range and behavioural patterns, thus failing to assess the potential effects of construction-related disturbance, noise, and increased activity. This oversight compromises the validity of any conclusions regarding the absence of significant

effects on otters.

Additionally, the assessment of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic, as it introduces considerable detection bias, particularly under the conditions typical of the Atlantic. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent utilisation of these waters. The neglect to incorporate or properly evaluate such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects that are founded on assumptions rather than robust evidence. The lack of sufficient baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. Consequently, there is considerable uncertainty surrounding the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to satisfy the requirements outlined within the Environmental Impact Assessment regime and the National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the lawful grant of consent cannot be justified.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species, thereby leading to the conclusion that the application lacks an adequate 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 submitted as part of the application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is located within key foraging areas and migratory pathways. The implications of displacement, collision risk, or habitat loss are not robustly evaluated, raising concerns regarding the potential impact on these populations.

A critical contradiction within the application arises from the developer's conclusion of no significant adverse effects, juxtaposed with the advancement of a Habitats Regulations derogation case, which is necessitated only where significant harm is anticipated. This inconsistency undermines the reliability of the assessment and

suggests that the conclusions drawn are unsupported by the evidence provided. Furthermore, the assessment fails to convincingly address the impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not fully account for the importance of these feeding grounds, and its reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor significantly increases risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application lacks a sufficient assessment of the long-term implications of sustained mortality within this corridor, as well as the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. Consequently, this engages the precautionary principle, preventing a lawful conclusion that would support consent.

These deficiencies also signify 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 opposition to national policy. Collectively, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence render it unreliable, hindering a comprehensive evaluation of impacts and leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The evaluation of cultural heritage and community identity is alarmingly inadequate, notably failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application employs a reductive method, viewing heritage merely as a collection of isolated, static entities instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Particularly troubling is the treatment of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active places for burial and spiritual practices, yet they are mischaracterised as static features, ignoring their continued significance and the implications of development on their settings. This fundamental misunderstanding leads to an incomplete assessment of cultural effects and neglects the essential role these sites play in community life.

Moreover, there is a glaring omission in the consideration of intangible cultural heritage,

which encompasses the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity yet are completely overlooked in the assessment. This oversight prevents a comprehensive understanding of the cultural impacts stemming from the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity and bears characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of genuine engagement undermines the credibility of the assessment and overlooks established principles of participation in matters affecting cultural and environmental interests.

A significant procedural shortcoming is the absence of a valid Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to analyse the social, cultural, and economic impacts on the island community. This single omission renders the determination process unlawful.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The failure to incorporate both tangible and intangible heritage, along with the disregard for living cultural practices, constitutes a clear violation of policy mandates.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and legal obligations culminates in a substantial evidential gap. The cultural implications of the proposed development have not been adequately examined, and the application falls short of providing a solid foundation for understanding the true cultural cost involved.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The full Social Impact Assessment has not been published, resulting in a significant evidential gap that hinders the public and the competent authority from grasping the complete extent of social risks identified by the developer's research. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the lack of transparency around the full report obstructs proper scrutiny of its findings.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are thus grounded in reality, not speculation. However, the inability to review the full assessment limits the capacity to evaluate the significance of these effects in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with indications of "cultural loss" highlighted in the developer's own findings. Nevertheless, these



adverse impacts have not been adequately integrated into the main application, which is a serious oversight. The non-disclosure of the comprehensive Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning are at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and potential harm, largely due to the absence of the full dataset.

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

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material gap in the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the combination of the withheld full Social Impact Assessment and evidence of existing negative impacts renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and underscores the inadequacy of information supporting the application.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The proposal lacks a thorough assessment of the seascape, landscape, and visual impacts, failing to adequately represent the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is marked by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a continuous industrial presence that fundamentally alters this character, leading to a permanent transformation of the landscape.

There are serious concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests a risk of underestimating the magnitude of visual impact, which raises doubts about the reliability of the assessment.

The application fails to consider the interconnected relationship between landscape,

seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting intertwined with the Atlantic horizon. Treating these heritage assets as isolated, rather than recognising their interdependence, results in an inadequate evaluation of impacts on their setting and cultural significance.

The anticipated 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 poses not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4's commitment to safeguarding natural places and historic assets. The scale of the proposed changes is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

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

Overall, the assessment is inadequate, failing to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a dependable 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 within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to properly evaluate likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it relies on mitigation and contingency measures that are to be prepared after consent is granted. This approach hinders any meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment heightens the concerns associated with this reliance on undefined future measures. The West Lewis coastline is home to clean coastal waters and critical habitats that are particularly vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Additionally, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards will be established to respond effectively to pollution events. This situation introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of crucial environmental safeguards conflicts with the requirements set forth by the Environmental Impact Assessment regime. It is essential that likely significant effects and their mitigation are assessed prior to consent; without such information, a lawful determination cannot be achieved. The application also falls short in demonstrating compliance with policy requirements concerning environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately address the ecological or socio-economic impacts of the proposed development. It lacks a robust evaluation and fails to demonstrate how these vital habitats and activities can be protected or maintained without significant disruption.

A crucial concern is the flawed assumption that fishing activities can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from displacement. This oversight is critical, as the risk of overfishing in other areas may threaten the local fleet's livelihoods. A clear, evidence-based assessment is necessary to understand the implications for fisheries and the associated economic conditions.

The proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling for extended periods is expected to create disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a significant

proportion of the local bottlenose dolphin population raises serious issues, yet the application minimises these impacts without adequate evidence.

There exists an inconsistency within the application, wherein the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction undermines the assessment's credibility and raises significant concerns regarding adherence to the Habitats Regulations, especially when potential harm necessitates legal authorisation.

Furthermore, the assessment inadequately considers the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for determining 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 substantiate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusion regarding its sustainability.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the offshore turbines and onshore works is fundamentally flawed and fails to account for the full extent of impacts stemming from what constitutes a singular integrated project. The interconnected nature of these elements necessitates a comprehensive evaluation, yet the current fragmented approach obscures the overall environmental and socio-economic effects.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. Significant excavation across areas of deep peat, notably within Barvas Moor, raises serious concerns due to the ecological sensitivity and carbon storage function of these habitats. The application lacks a thorough assessment of these impacts, which hinders an accurate understanding of the project's overall environmental footprint.

Moreover, the decision to exclude or defer the evaluation of onshore impacts obstructs an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the artificial separation of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

In addition, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are safeguarded by policy protection. The current application does not illustrate that the impacts on these habitats have been thoroughly assessed, nor does it confirm that appropriate avoidance measures have been implemented, thereby highlighting a significant evidential gap in biodiversity protection.

Concerns also arise regarding the project's carbon balance, as the disturbance of peatland may release stored carbon, potentially generating a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this critical issue and fails to demonstrate that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application does not furnish evidence that the necessary consents or procedural steps have been initiated, raising doubts about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project as a unified whole and to demonstrate the protection of peatlands, habitats, and land use interests directly contradicts 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 insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, inhibiting a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is distinguished by its exceptionally dark skies, which are a vital element of environmental quality, cultural identity, and tourism value. However, the proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This alteration of the night-time environment is significant, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Such an omission is particularly concerning given the importance of dark skies to the area's identity and the potential for emerging tourism sectors like astro-tourism.

Moreover, there is a critical lack of evaluation regarding the impacts on nocturnal wildlife. Species including the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks any lighting impact assessment or phototaxis study, failing to investigate how the proposed aviation lighting may adversely affect these species or contribute to increased

mortality.

This failure is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not address nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also vulnerable to the disorientation caused by artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. It undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the overall setting.

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

## **TOURISM**

The evaluation of tourism impacts within the application is significantly lacking, particularly regarding the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative assessment provided regarding how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The growth of tourism has been notable, with its contribution rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. Despite this positive trajectory, the application fails to model the potential impact of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without such necessary analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or harm an already established and expanding sector.

Additionally, the assessment neglects to acknowledge the significance of environmental quality in fostering tourism, specifically regarding the role of unspoiled landscapes and dark skies in enhancing visitor experiences. This oversight is

particularly concerning given the rise of niche markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the effects on a recognised and developing segment of the local economy.

In light of the limited economic diversification within the island community, the failure to assess tourism impacts has broader consequences for employment, local businesses, and community sustainability. Furthermore, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the necessity to show a 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 gauge the economic ramifications of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental factors that influence visitor behaviour, and recognise the island's economic dependencies has resulted in a significant evidential gap. This gap hinders a comprehensive 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 fundamentally fails to meet the requirements of sustainable development as evaluated against statutory duties, national policy, and evidential standards. Similar to the Lewis Wind Power proposal, which was rejected in 2008 due to unacceptable industrialisation, this application is now being assessed under an improved policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for this application. It lacks comprehensive baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Crucial impact pathways concerning nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

Moreover, there are procedural failings that cannot be ignored. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal directly contradicts National Planning Framework 4 by failing to protect



biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been thoroughly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal are uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, a formal request is made for the refusal of consent for the Spiorad na Mara Offshore Wind Farm in its entirety.

### **Additional Comments**

It will affect the area in all the above ways. I will no longer be planning any holidays there if this goes through, enough of our wild places have been lost please spare the outer Hebrides

**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: FAA49DAE

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

**Dear Sir/Madam**

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documentation, highlighting significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and overall design, which may not align with statutory requirements, national policies, or the tenets of sustainable development.

The application is deficient in providing an adequate factual basis for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal remain unclear. The flexible design framework utilised creates challenges in comprehending potential significant effects, while the dependence on unspecified mitigation strategies means that their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a comprehensive or informed understanding of the environmental, cultural, or community ramifications, with assertions of negligible or non-significant effects lacking robust evidential support.

Substantial policy inconsistencies are evident. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national mandates to safeguard biodiversity, address climate concerns, and maintain environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the capability of the competent authority to ascertain the development's acceptability under policy frameworks.

The proposal's unprecedented scale at this location, with large turbines placed near the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental consequences. Together, the lack of comprehensive information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy violations suggest that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is inadequate, failing to provide a complete and transparent evaluation of the potential environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This lack of specificity undermines the assessment's integrity, meaning that the impacts presented may not accurately reflect the actual development, thereby preventing both the public and the competent authority from fully grasping the true environmental implications.

Additionally, the application is dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental damage will be resolved later limits any meaningful assessment of effectiveness or residual impacts. This postponement of essential information until after consent is granted is not procedurally acceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly delineated prior to any determination.

There are also major evidential gaps in the assessment, which include shortcomings in baseline data and methodology, as well as an over-reliance on assumptions rather than site-specific evidence. This generates uncertainty about the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hinders a comprehensive understanding of cumulative and worst-case impacts, creating scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential standards stipulated under the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, which includes mandates for biodiversity protection and environmental integrity, as it has not been established that impacts have been thoroughly evaluated or that suitable safeguards are in place.

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

## **ASSESSMENT OF ALTERNATIVES**

The assessment of alternatives presented in the application is materially inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the

project's evolution. This narrative approach does not adequately show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the developer has not convincingly demonstrated that the possibility of placing turbines further offshore has been seriously considered, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, highlights the significance of the missing analysis, which prevents any conclusion regarding whether the proposed siting is indeed the least damaging option.

These deficiencies extend to the evaluation of cable routing and landfall, where insufficient evidence is presented to show that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis suggests that mitigation by design has not been effectively applied, relying instead on post-design mitigation measures.

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

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The marine ecology assessment related to the proposed development suffers from significant deficiencies that compromise our understanding of ecological receptors in the West Lewis coastal environment. This area is noted for its sensitivity and biological activity, yet the data provided is incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of species in this ecosystem. Consequently, the evidential basis for evaluating potential impacts is fundamentally flawed.

A critical oversight in the assessment involves otters, recognised as a European Protected Species. The application neglects to properly account for their active foraging

and movement in coastal areas. This lack of attention to their core foraging range and behavioural patterns means that the possible impacts from construction disturbance, noise, and increased human activity have not been thoroughly assessed. Such omissions undermine any assertions regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks is inadequate, with a heavy reliance on aerial surveys that introduce significant bias in detection, particularly under typical Atlantic conditions. This methodology is likely to lead to an underestimation of their presence in the waters concerned, especially in light of established land-based observations that indicate frequent use of these areas. The failure to consider such pertinent data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

The methodological flaws present in the assessment suggest that conclusions regarding negligible or non-significant effects are founded on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which should encompass seasonal variations and broader ecosystem interactions. This gap creates a level of uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or the standards set by National Planning Framework 4, as protected species have not been sufficiently identified or assessed. This introduction of uncertainty prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately highlighting the lack of a sufficient evidential foundation for the application.

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application proposes the development of turbines situated within a key migratory corridor on the west coast of the Isle of Lewis, an area that is home to internationally significant seabird populations, many of which are already experiencing decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The assessment fails to adequately demonstrate that these seabird species will not be adversely affected, particularly regarding important foraging areas and migratory pathways. It does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A notable contradiction arises within the application, as 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 doubts about the reliability of the assessment, suggesting that the conclusions drawn are not supported by the underlying evidence. Additionally, the assessment lacks adequate evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial significance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor introduces an additional and substantial risk, effectively acting as a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies further reflect non-compliance with 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 affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to meet the statutory requirements necessary for a favourable determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment of community identity and cultural heritage is critically flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The application adopts an overly simplistic view, reducing heritage to isolated, static assets instead of acknowledging 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 they are mischaracterised as static features in the assessment. This oversight fails to consider their current use and the implications of development on their surroundings, resulting in an incomplete evaluation of cultural

effects and overlooking their vital role in community life.

Moreover, the application neglects to assess intangible cultural heritage, such as the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These elements are fundamental to the area's identity but are completely absent from the assessment, which is a major shortcoming. The cultural impact of the development cannot be accurately gauged without considering these factors.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This failure prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and sites. The failure to adequately consider both tangible and intangible heritage, along with the disregard for living cultural practices, indicates a clear violation of policy expectations.

When these factors are collectively examined, it is evident that the failure to assess living heritage, intangible cultural value, community rights, and statutory requirements results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for evaluating the genuine cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The developer's Social Impact Assessment has not been fully published, leading to a significant evidential gap that affects public understanding and the competent authority's evaluation of social risks. Although focus groups with local residents were conducted, the absence of the complete report limits scrutiny of the findings and the assessment of their significance in the decision-making process.

Summaries suggest that local residents are experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, and these impacts are based on direct engagement rather than speculation. Furthermore, the proposal appears to threaten community identity and cohesion, with "cultural loss" identified in the developer's findings. However, these concerns have not been adequately addressed within the



main application. The lack of transparency regarding the full Social Impact Assessment conceals the true human and social cost of the development.

This deficiency undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this nature, particularly when community character is at stake. Without the complete dataset, the application does not provide a sufficient evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application fails to align with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the disclosed evidence points to existing adverse effects that have not been adequately communicated. Consequently, compliance with this policy remains unproven.

The procedural implications are critical. The competent authority's ability to conduct a thorough socio-economic and health evaluation is hindered by the lack of access to the full Social Impact Assessment, constituting a material omission and a failure to comply with the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable, obstructing a lawful determination and reinforcing the assertion that the application lacks sufficient information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The proposed development threatens the West Lewis coastline, characterised by its open Atlantic horizon and a sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, permanently altering the landscape and its natural character. This change is not merely visual but fundamentally transformative, undermining the very essence of what makes this area special.

The application fails to accurately convey the extent of the visual change. The sheer scale and proximity of the turbines would dominate views from residential areas and historic sites, significantly impacting visual amenity and eroding the qualities of naturalness and remoteness that define the region. Such oversight in the assessment neglects the profound significance of this impact within such a sensitive landscape.

Concerns arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises questions about the reliability of the assessment and whether it truly captures the magnitude of the visual impact.

Moreover, the relationship between landscape, seascape, and cultural heritage has not

been appropriately assessed. Prominent sites such as the Calanais Standing Stones are integral to the wider landscape, interlinked with the Atlantic horizon both visually and spatially. By treating these assets as isolated, the assessment overlooks their interdependence and the impacts on their cultural significance.

The industrialisation of the seascape would disrupt the context in which these heritage assets are experienced, severing their connection to the natural horizon. This transformation represents not just a visual impact but a broader cultural and spatial harm that remains unexamined within the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural and historic assets. The scale of the proposed changes fails to meet the requirements to safeguard landscape character and visual amenity, as well as the settings of culturally significant sites. The lack of a thorough worst-case assessment further casts doubt on the proposal's compliance with established policies.

Lastly, it is evident that the impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure that their presence is dominant and unavoidable, resulting in changes that are fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These significant deficiencies highlight the proposal's incompatibility with the preservation of this vital landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The application presents significant deficiencies in its assessment of construction and pollution risks, failing to offer the necessary detail for evaluating potential environmental effects. It entails considerable seabed preparation and installation work in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the proposal relies on mitigation and contingency measures that will be formulated post-consent, thus obstructing any meaningful assessment of their adequacy or effectiveness.

The absence of defined future measures is particularly alarming, especially given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to disturbances and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it does not provide adequate detail on prevention, control, or monitoring strategies.

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the

extent, duration, or ecological ramifications of these impacts. This uncertainty also pertains to the potential effects on sensitive marine species and habitats identified in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By delaying contingency planning until after consent has been granted, the application hinders the evaluation of whether proper safeguards are in place to address pollution incidents. This approach introduces procedural risks and compromises the capability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to granting consent, and the absence of such critical information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of specified mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These shortcomings impede 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 both a vibrant marine ecosystem and an active fishing industry. However, the application fails to adequately evaluate the ecological or socio-economic impacts of the proposed development, raising immediate concerns about the potential disruption to these vital resources. It is alarming that the assessment makes the assumption that fishing activities can be displaced without any consequences, yet it provides no evidence to support the availability or accessibility of alternative fishing grounds that could sustain the additional pressure. This significant omission risks overfishing in other areas and poses wider economic threats to the local fishing fleet. Without a thorough, evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling expected to take place over a prolonged period is likely to disturb marine life across substantial distances, with species such as dolphins at risk. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises profound concerns. Alarming, the application downplays these potential impacts without providing sufficient supporting evidence.

Additionally, there exists a troubling inconsistency within the application. While it acknowledges the necessity for licences to permit harm to European Protected

Species, it simultaneously categorises such impacts as negligible. This contradiction not only undermines the credibility of the assessment but also raises serious concerns about compliance with the Habitats Regulations, especially where harm necessitating legal authorisation is anticipated.

The assessment also neglects to take into account the cumulative impacts that result 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 compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal constitutes sustainable development.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The offshore turbines and onshore works are part of a single integrated project, yet the current assessment of onshore infrastructure is materially incomplete. By treating these elements separately, a fragmented approach emerges that obscures the full scale of environmental and socio-economic impacts. This deficiency prevents a clear understanding of the project's overall environmental footprint.

The onshore components involve cabling through protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure across sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, poses significant risks, as this region serves as a crucial carbon store and ecologically sensitive habitat. The failure to provide a comprehensive assessment of these impacts raises substantial concerns.

Moreover, excluding or deferring the assessment of onshore impacts hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively, yet the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are inadequately understood.

There are also significant risks to habitats such as machair systems and peatland environments, which are protected by policy. The application falls short of demonstrating that impacts on these sensitive areas have been fully assessed or that

appropriate avoidance measures are in place, resulting in a clear evidential gap concerning biodiversity protection.

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

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

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in the emerging sector of astro-tourism. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" visible over long distances, fundamentally changing the night-time environment. This alteration has not been assessed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors, representing a significant gap in the Environmental Impact Assessment.

Furthermore, there is no evaluation of the effects of this lighting on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can lead to disorientation and increased collision risks. The absence of a lighting impact assessment or phototaxis study means the application fails to consider how such aviation lighting may affect these species or contribute to higher mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which overlooks nocturnal activity and associated risks. This is particularly concerning for species such as Kittiwakes, which may forage or migrate at night and are also vulnerable to disorientation from artificial lighting. Without site-specific night-time data, there is a critical lack of understanding regarding the ecological impacts. The failure to assess nocturnal impacts makes it impossible to ascertain whether protected species or designated sites might be adversely affected, breaching the evidential standard needed to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, hindering a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4

regarding the protection of natural places and environmental quality. The gaps in assessment further undermine the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem. Collectively, the lack of any assessment related to dark skies and nocturnal wildlife represents a significant evidential gap, rendering the application incomplete and unfit for lawful determination.

## TOURISM

The application presents significant deficiencies in assessing the impacts on tourism, a vital component of the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. Despite the application acknowledging that 86% of visitors are attracted by the scenery, it fails to quantify how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Since 2017, tourism has experienced considerable growth, rising from £65 million to over £81.5 million, while supporting more than 1,000 jobs and contributing up to 16% of the island's economy. Nevertheless, the application does not evaluate how the anticipated industrialisation of the seascape and potential loss of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this analysis, it remains unclear whether the development would provide a net economic benefit or jeopardise an established and growing sector.

The significance of environmental quality in enhancing the tourism experience is also overlooked, specifically the value of unspoiled landscapes and dark skies, both of which are crucial for attracting visitors and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortfall, creating a substantial gap in understanding the impact on a recognised and growing segment of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts has broader ramifications for local employment, businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed in accordance with the requirements set out in the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental factors that influence visitor behaviour, and considering the economic dependency of

the island create a substantial evidential gap. This undermines 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 duties, national policy, and evidential standards. It echoes the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a central concern. The current application is submitted under a policy framework that ostensibly prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are critical gaps in the evidential basis required for decision-making, including incomplete baseline data and the use of an undefined design envelope. Additionally, there is an overreliance on unspecified mitigation measures, while key impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—have been overlooked. The Environmental Impact Assessment is therefore inadequate, failing to provide a full understanding of the potential significant effects or residual impacts.

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

Moreover, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, and cultural heritage; it fails to show that health and wellbeing impacts are acceptable; and it lacks evidence of a net economic benefit, due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring their 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 occasionally inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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



In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, alongside 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 invoke the necessary regulatory provisions to require the submission of the outstanding information.

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

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3E92D758

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

**Dear Sir/Madam**

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

The documentation provided fails to establish an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information presented is both limited and inconsistent. Key elements of the proposal remain undefined, and the flexible design framework employed does not allow for a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the information fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests required for consent and hinder the competent authority's ability to determine the development's acceptability from a policy perspective.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In this context, it is imperative that the precautionary principle be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report presents numerous deficiencies that render it unreliable and incomplete. It heavily relies on undefined mitigation measures, monitoring strategies, and management plans that have not yet been articulated. This

approach seeks consent based on the premise that environmental harms will be managed in the future, thus obstructing any meaningful evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Deferring critical information to the post-consent stage is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates the clear establishment of significant effects and their mitigation before any determination is made.

Additionally, there are considerable gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when claims of negligible or non-significant effects are not backed by robust data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty incompatible with statutory obligations.

Moreover, this application does not meet the evidential threshold stipulated under the Habitats Regulations, as it fails to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, as it does not demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

The reliance on a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, fosters significant uncertainty that hinders a consistent application of a worst-case scenario. Such a lack of commitment undermines the integrity of the assessment, meaning that the impacts presented may not truly represent the development ultimately constructed. Consequently, the competent authority and the public are left without a clear understanding of the actual environmental effects, which further complicates the decision-making process.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach by treating heritage as isolated and static, ignoring their ongoing social, cultural, and spiritual functions within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active burial and spiritual places. Yet, these are mischaracterised as static features in the assessment, which fails to acknowledge their continued use, meaning, and the potential impact of development on their setting. This oversight leads to an incomplete evaluation of cultural effects and neglects their significance in community life.

The assessment also overlooks intangible cultural heritage, such as the Gaelic language and traditions, along with the deep connection between the community and

the coastal environment. These aspects are vital to the identity of the area and their absence signifies a significant omission. Without addressing these factors, the cultural impact of the development cannot be accurately assessed.

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

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

These deficiencies conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to recognise living cultural practices is a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sufficient basis for determining the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The proposed development raises serious concerns regarding the assessment of social impacts, health, and wellbeing, which is materially deficient and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment, including focus groups with local residents, the full report remains unpublished. This significant evidential gap obstructs both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are, therefore, not speculative in nature. However, the failure to disclose the complete assessment hampers proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

There is evidence indicating that the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been adequately incorporated into the main

application or afforded appropriate consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency detracts from the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functionality might be compromised. By failing to provide the complete dataset, the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the available evidence suggests existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to confirm compliance with this policy.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This incapacity to provide sufficient information obstructs a lawful determination of the application.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

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

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

Concerns also arise regarding the selection and presentation of visual viewpoints, as evidence indicates that these may not adequately capture the most sensitive receptors

or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This may result in an understatement of the magnitude of visual impact, which compromises the overall reliability of the assessment.

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

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

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

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected relationship between landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is incompatible with the protection of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The application lacks the necessary detail to properly assess construction and pollution risks, rendering the environmental evaluation fundamentally inadequate. It involves extensive seabed preparation and installation within a challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified future mitigation and contingency measures, which hinders any meaningful assessment of their effectiveness or sufficiency.

This dependence on vague future strategies is particularly alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and significant habitats susceptible to sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and accidental chemical or

oil spills, it does not adequately detail how these will be prevented, monitored, or controlled.

There is significant uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on already identified sensitive marine species and habitats.

Moreover, the lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application precludes evaluation of whether suitable safeguards are in place for responding to pollution incidents. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The application presents significant shortcomings in its assessment of fisheries and marine life, which fails to offer a thorough evaluation of both ecological and socio-economic impacts. It has been established that the waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these crucial uses and habitats can be preserved or maintained without considerable disruption.

A notable concern lies in the assumption that fishing activities can be displaced without negative repercussions. The application lacks evidence to support the claim that alternative fishing grounds are both available and capable of withstanding additional pressure. This gap in information is critical, as such displacement could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses significant risks to marine species, especially through



the underwater noise generated during construction activities. The anticipated high-energy hammer piling, conducted over an extended duration, is expected to disturb marine life over large distances, particularly affecting species like dolphins. The predicted disruption to a substantial portion of the local bottlenose dolphin population raises grave concerns, yet the application seems to downplay the significance of these potential effects, lacking sufficient evidence to support such minimisation.

There is also a striking inconsistency within the application, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction raises doubts about the credibility of the assessment and raises alarm over compliance with the Habitats Regulations, particularly concerning anticipated harm that would require legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts that arise from various 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 alignment with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, thus undermining any conclusion that the proposal constitutes sustainable development.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the project's onshore infrastructure is significantly lacking, failing to address the full range of impacts associated with what constitutes a single integrated development. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a fragmented approach that obscures the comprehensive environmental and socio-economic effects of the project.

The onshore components consist of cabling traversing protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is both a critical carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the evaluation of onshore impacts, the application fails to

allow for an accurate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in tandem, yet the division between offshore and onshore components means that the combined effects on peatlands, habitats, and communities remain inadequately understood.

Moreover, there are considerable risks to delicate habitats, such as machair systems and peatland environments that enjoy policy protection. The application does not sufficiently demonstrate that the potential impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place. This presents a substantial evidential gap in relation to the protection of biodiversity.

The proposal also prompts concerns about the carbon balance. Disturbing peatland releases stored carbon, which could create a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently tackle this concern or confirm that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or procedures have been initiated, leading to uncertainties regarding deliverability and lawful implementation.

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

In summary, the separation of the project's 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, obstructing a lawful determination.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The lack of evaluation regarding nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. No assessment has been made concerning the impacts of artificial lighting on species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to light. These species can experience disorientation due to phototaxis, leading to an increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which means it fails to consider how the proposed aviation lighting could affect these species or potentially increase mortality rates.

Moreover, the assessment relies on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are similarly vulnerable to the effects of artificial lighting. This oversight creates a critical gap in understanding the ecological impacts that the proposal may have on local wildlife.

The introduction of permanent red aviation lighting is another significant concern. This lighting would be visible over long distances, creating an intrusive "wall of light" across the western horizon, which would fundamentally alter the night-time environment. The assessment does not address how this would impact visual amenity, landscape character, or the experience of residents and visitors, despite the importance of dark skies to the area's identity and its emerging tourism sectors, such as astro-tourism.

From a policy standpoint, these omissions conflict with National Planning Framework 4, which relates to the protection of natural places and environmental quality. The absence of an assessment of dark skies undermines the broader evaluation of landscape and seascape impacts, as the night-time character is an integral part of the environment.

Overall, the failure to assess the impacts on dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination. Without a thorough assessment, it is impossible to ascertain whether protected species or designated sites would be adversely affected, which engages the precautionary principle and necessitates a more cautious approach.

## **TOURISM**

The assessment of tourism impacts within the application is severely lacking, failing to address the economic and social ramifications for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the area's unspoiled coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of the sector.

The significance of tourism is evident in its substantial growth, with revenue 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. Despite this positive trend, the application does not analyse how the potential industrialisation of the seascape and the resultant loss of environmental quality might affect Tourism Gross Value Added or broader economic resilience. Without such analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or detract from a sector that is both established and expanding.

Furthermore, the assessment neglects to consider the crucial role of environmental quality in fostering tourism, particularly the significance of unspoiled landscapes and dark skies in enhancing visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a notable gap in understanding the impacts on a recognised and growing component of the local economy.

In an island community with limited economic diversification, the oversight in assessing tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been 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 need to demonstrate 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 consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and considering the economic dependency of the island lead to a significant evidential gap. This undermines the ability to conduct a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

## SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development when evaluated against statutory duties and national policy. The concerns raised are similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, while submitted under a more robust policy framework, still lacks necessary considerations for biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It fails to provide reliable baseline data, relies on an undefined design envelope, and does not specify its mitigation measures. Critical pathways of impact, including effects on nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. This renders the Environmental Impact Assessment incomplete, hindering an understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment constitutes a serious omission. These failures hinder a proper assessment of impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts the National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural spaces, and cultural heritage. Additionally, it fails to show acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been

assessed appropriately, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals raise concerns. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. The competent authority must refuse consent or require the submission of the missing information.

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

### **Additional Comments**

These turbines should have been situated outside the marine traffic highway as originally intended . The local council wrongly suggested moving them closer and that they found no local objection , - they did not consult the local population, who are watching their environment being turned into an industrial profit making scheme for foreign shareholders who know not or care not for the people or culture and traditions of the local populace. The fact that the crumbs they are being offered is an insult added to the wasteland that the next generations will inherit means nothing to the ministers in the Scottish government who blindly approve such projects in the name of net zero , when the electricity generated will go to England and leave the island with the highest bills in the land.

Stop this insanity now !!!!!

**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: 26EE78CC

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

**Dear Sir/Madam**

This letter constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. There are significant concerns about the scale, proximity, and design of the proposal in relation to its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful determination. There is a lack of critical environmental data, and the baseline information presented is limited and inconsistent. Key aspects of the proposal remain undefined, and the flexible design framework employed prevents a clear understanding of potential significant effects. Furthermore, reliance on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to offer a comprehensive or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national requirements to safeguard biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly undermine the statutory tests required for consent and compromise the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly with large turbines positioned in close proximity to the shoreline. 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. Under 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 lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound



evidential basis for evaluating potential impacts.

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

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

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

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The application proposes the development of turbines situated within a key migratory corridor on the west coast of the Isle of Lewis, an area that is home to internationally significant seabird populations, many of which are already experiencing decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The assessment fails to adequately demonstrate that these seabird species will not be adversely affected, particularly

regarding important foraging areas and migratory pathways. It does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A notable contradiction arises within the application, as 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 doubts about the reliability of the assessment, suggesting that the conclusions drawn are not supported by the underlying evidence. Additionally, the assessment lacks adequate evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial significance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor introduces an additional and substantial risk, effectively acting as a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies further reflect non-compliance with 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 affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to meet the statutory requirements necessary for a favourable determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead, it adopts a simplistic view, treating heritage merely as a collection of static assets, ignoring their ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites such as the

cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice, yet they are mischaracterised as static features. This oversight neglects their continued use and the importance of their settings, leading to an incomplete understanding of the cultural effects and their significance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language and local traditions, as well as the enduring relationship the community has with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the evaluation, resulting in a substantial gap in understanding the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population is recognised as having a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions impacting cultural and environmental interests.

Additionally, the failure to conduct a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018, represents a significant procedural lapse. This absence 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 shortcomings place the proposal at odds with the National Planning Framework 4, especially concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the lack of recognition for living cultural practices, constitutes a clear deviation from policy requirements.

Overall, the failure to thoroughly assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for determining the true cultural costs associated with the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The developer commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This lack of transparency prevents both the public and the competent authority from understanding the extent of the social risks identified in the developer's research. Summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, not speculation. Nonetheless, the failure to disclose the full assessment hinders proper scrutiny of these findings and

limits the ability to assess their significance in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. However, these impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be affected. Without the full dataset, the application does not provide a comprehensive basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet available evidence shows existing adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with this policy cannot be established.

The procedural implications are critical. 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.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and supports the conclusion that the application lacks sufficient information.

## **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a dominant industrial presence, fundamentally transforming this character and causing a permanent alteration to the landscape. The assessment presented fails to represent the scale of this visual change adequately, as the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, adversely impacting visual amenity and eroding the naturalness and remoteness of the area.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively capture the most sensitive receptors or potential worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, thereby undermining the assessment's reliability.

Moreover, the relationship between landscape, seascape, and cultural heritage has not

been sufficiently explored. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, which is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment neglects their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connections to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change threatens the safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a rigorous worst-case assessment calls into question any claims of policy compliance.

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

Overall, the assessment is inadequate in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the necessary protection of this landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The absence of detailed management plans, along with undefined mitigation measures, renders the assessment of construction and pollution risks materially deficient. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on future mitigation and contingency measures to be formulated post-consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future actions is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventative, control, or monitoring measures for these risks.

Further uncertainty exists 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 consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are established to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and proposed mitigation measures must be assessed prior to consent; the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the deficiencies noted in the application—the lack of defined mitigation measures, insufficient detail in management plans, and uncertainty surrounding potential impacts—strongly indicate that a robust evaluation of construction and pollution risks is not feasible, leading to the conclusion that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The assessment of the proposed development lacks a robust evaluation of ecological and socio-economic impacts, particularly concerning fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be preserved without substantial disruption.

A major concern is the erroneous assumption that fishing activity can be displaced without any consequences. The application fails to provide evidence that there are alternative fishing grounds that are available, accessible, or able to support the additional pressure that displacement would create. This oversight is critical, as such displacement could lead to overfishing in other areas and potentially have broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, primarily due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances, particularly affecting species such as dolphins. The anticipated disturbance to a

notable portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is recognised, while the impacts are simultaneously portrayed as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially in situations where harm may require legal authorisation.

Additionally, the assessment does not adequately consider the 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 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 National Planning Framework 4 or the National Marine Plan. It does not substantiate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby impeding any conclusion regarding the proposal's sustainability.

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The 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.

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, which constitutes a material omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development includes the installation of permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

Additionally, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant given the importance of dark skies to the area's identity and the burgeoning astro-tourism sector. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, failing to explore how aviation lighting could affect these species or contribute to increased mortality.

This omission is further exacerbated by an overreliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or related risks. For instance, Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has been ignored. The absence of site-specific night-time data presents a significant gap in the understanding of ecological impacts.

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

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

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

## **TOURISM**

The economic contribution of tourism to the Isle of Lewis is substantial, having risen from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the application fails to assess how large-scale offshore infrastructure would impact visitor numbers, behaviour, or the overall economic contribution of tourism, despite acknowledging that 86% of visitors are attracted by the area's scenery. The absence of a comprehensive evaluation on how the industrialisation of the seascape and a decline in environmental quality would influence Tourism Gross Value Added or broader economic resilience raises concerns about potential negative repercussions on this vital sector.

Moreover, the assessment neglects the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies for enhancing visitor experiences and promoting emerging markets like nature-based tourism and astro-tourism. This gap is further exacerbated by the lack of a Dark Skies

Assessment, which is crucial for understanding impacts on this recognised and growing segment of the local economy.

Given that the island community has limited economic diversification, the failure to analyse the impacts on tourism has 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 properly evaluated, as stipulated under the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This inadequacy hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

## **SUMMARY**

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This proposal mirrors the fundamental issues that led to the refusal of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was highlighted. Although the current submission is made under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A reliable evidential basis for determination is notably absent in the application. Critical gaps in baseline data, the reliance on an undefined design envelope, and unspecified mitigation measures contribute to this inadequacy. Furthermore, the omission of key impact pathways, such as those affecting nocturnal wildlife, the full onshore infrastructure, and tourism impacts, render the Environmental Impact Assessment incomplete. This deficiency hinders a comprehensive understanding of likely significant effects or residual impacts.

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

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

adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage. Additionally, there is a lack of evidence to support acceptable health and wellbeing impacts, as well as a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, which obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential threshold required to demonstrate that adverse effects are excluded beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of the impacts.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks prevents an evidence-based decision. The competent authority must either refuse consent based on these grounds or exercise the relevant regulatory provisions to mandate the submission of the missing information.

In conclusion, 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 like many who live here, am highly sensitive to the local environment. Having considered the details of the project application within the EIA, I most certainly would find the impacts for me and my family from the wind farm unbearable. Knowing my community well I here inform Scottish Ministers that too high a proportion of my community will be similarly affected. This is counter to the definition of sustainable development in Scottish Parliament Sustainable Development Impact Assessment (SDIA) which states “a project must meet the needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion. Given the proximity of the development to our family croft which we work and goes back several generations, if this project is to go ahead, my wife and I along with our three young children will be leaving the island permanently.

**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: 056E2529

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

**Dear Sir/Madam**

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, which highlight significant deficiencies across planning, environmental, cultural, and procedural dimensions. The wind farm is planned off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The design, proximity, and overall scale of the proposal raise critical questions about its compliance with statutory obligations, national policy frameworks, and the core principles of sustainable development.

A fundamental issue with the application is the inadequate evidential basis for reaching a lawful determination. Important environmental data is absent, baseline information appears limited and inconsistent, and several key elements of the proposal remain vague. The flexible design framework employed complicates an accurate assessment of potential significant effects. Furthermore, the documentation relies on unspecified mitigation measures, which hinders the ability to evaluate their effectiveness. Consequently, it does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leaving the claims of negligible or non-significant effects unsupported by solid evidence.

The proposal encounters notable policy conflicts. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and overall health and wellbeing. The application fails to prove that it meets national criteria aimed at protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies impact the statutory tests needed for consent and challenge the competent authority's ability to determine the proposal's acceptability in terms of policy.

Moreover, the unprecedented scale of the development in this area raises substantial concerns about its landscape capacity, visual impact, and environmental repercussions, especially with large turbines situated close to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is insufficient and unable to support a lawful determination. In light of these factors, adherence to the precautionary principle is essential.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

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

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

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

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

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

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The assessment related to marine ecology and protected species within the West Lewis coastal environment is severely lacking. This area is a biologically active and sensitive marine system, yet the baseline data presented is insufficient, and the methodologies



used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a reliable evidential basis for evaluating potential impacts.

Notably, there is a significant omission regarding otters, classified as a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. This oversight, which neglects their core foraging range and behavioural patterns, means that the possible effects of construction disturbance, noise, and increased activity have not been sufficiently assessed. This gap undermines the conclusions drawn about the absence of significant effects on this species.

There are further shortcomings in the evaluation of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly in the 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 reached.

The methodological limitations identified suggest that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of comprehensive baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or assess protected species adequately. The uncertainty generated hinders the possibility of excluding adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The assessment of the proposed development lacks reliability due to significant internal inconsistencies and methodological weaknesses, leading to insufficient evidence. It fails to meet the necessary evidential standards required to ascertain no adverse effect on the integrity of protected sites. The application contains contradictory conclusions, raising questions about the reliability of its findings. Importantly, the presence of data gaps and limitations in the modelling approaches employed means

that the standard of beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle.

The assessment inadequately evaluates the implications of potential displacement, collision risks, and habitat loss for seabird populations, particularly within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Additionally, it does not sufficiently demonstrate 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 fully recognised, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, where mortality rates are likely underestimated due to incomplete baseline data and unexamined behavioural responses.

Furthermore, the location of turbines within a recognised migratory corridor raises significant concerns, as it effectively creates 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 have not been adequately assessed, nor have the potential impacts on species with relatively small global populations been thoroughly explored.

From a regulatory standpoint, the proposal fails 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 application in direct conflict with national policy.

In conclusion, the combination of methodological deficiencies, insufficient evidence, and internal inconsistencies renders the ornithological assessment unreliable. These issues prevent a thorough evaluation of the potential impacts, ultimately indicating that the application does not satisfy the statutory requirements necessary for proper 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 failure to disclose the full Social Impact Assessment is a significant concern that undermines the Environmental Impact Assessment process. Without this transparency, the competent authority cannot conduct a robust evaluation of the social, economic, and health implications of the proposed development. The absence of complete data constitutes a material omission and fails to meet the evidential requirements necessary for lawful decision-making.

Local residents have expressed measurable stress, anxiety, and concern due to the scale and proximity of the proposal, which reflects a tangible impact rooted in direct engagement. This evidence, derived from community feedback, highlights the risks associated with the development but remains inadequately addressed in the application due to the non-disclosure of the full assessment.

Moreover, the developer's findings indicate a perception of the proposal as a threat to community identity and cohesion, with significant concerns about "cultural loss." However, these issues have not been fully integrated into the application or given proper consideration. As a result, the true human and social cost of the development remains obscured, limiting the ability to assess the overall significance of these impacts.

From a policy perspective, there is a failure to comply with National Planning Framework 4, which emphasizes the need for developments to support positive health outcomes and avoid harm. The existing adverse effects highlighted in the available evidence have not been sufficiently disclosed, making it impossible to demonstrate adherence to this policy.

Collectively, these issues reveal a concerning gap in the assessment process. The non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This hinders the ability to make a lawful determination regarding the application and highlights the necessity for a comprehensive understanding of the social impacts involved.

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, is a region defined by a profound sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, threaten to impose a continuous and dominant industrial presence that would irrevocably alter the existing landscape character. This transformation represents a permanent change that cannot be undone, fundamentally affecting the area's visual amenity and eroding its naturalness.

The assessment of the visual impacts associated with this proposal is grossly inadequate, failing to capture the true magnitude of the changes expected. The scale and proximity of the turbines would mean they dominate views from residential areas, historic sites, and popular coastal locations. However, the evaluation does not convey the significance of this impact in a sensitive landscape context. Concerns are raised about the selection and presentation of visual viewpoints, which may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites. This flaw risks understating the true extent of visual impact, thereby compromising the overall reliability of the assessment.

Moreover, there is a critical oversight in the evaluation of the interconnected relationships between seascape, landscape, and cultural heritage. Notably, significant sites like the Calanais Standing Stones are part of a broader landscape that relies on visual and spatial connections to the Atlantic horizon. The current assessment treats these heritage assets as isolated, disregarding their interdependence with the surrounding environment, leading to a limited evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these vital relationships, changing

how heritage assets are perceived and severing their connection to the natural horizon. This constitutes not only a visual impact but also a deeper cultural and spatial detriment that has not been properly assessed. From a policy standpoint, the proposal contravenes National Planning Framework 4 by failing to protect natural places and historic assets adequately. The scale of change envisaged conflicts with the essential requirements to safeguard landscape character and the setting of culturally significant sites, and the absence of a comprehensive worst-case assessment further undermines compliance with policy guidelines.

It is evident that the impacts cannot be effectively mitigated. The height and proximity of the turbines ensure their presence would be both dominant and unavoidable, marking a fundamental and permanent alteration to the landscape that cannot be sufficiently reduced through mitigation efforts. In summary, the assessment overlooks the critical scale of impact, the sensitivity of the environment, and the intricate interrelationships between landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the proposal's incompatibility with the preservation of this vital landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The application lacks sufficient detail regarding the assessment of construction and pollution risks, rendering it materially deficient. It involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated post-consent, which hampers any meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and accidental chemical or oil spills, it fails to furnish adequate detail on the methods of prevention, control, or monitoring of these risks.

Moreover, there exists uncertainty surrounding the scale and behaviour of sediment plumes produced by seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, the potential extent, duration, and ecological effects of these impacts cannot be determined. This uncertainty extends to potential consequences for marine species and habitats that have already been acknowledged as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the assessment of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capability of the competent authority to review environmental protection measures during the

determination process.

From a regulatory viewpoint, the postponement of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent, and in the absence of this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

## **FISHERIES AND MARINE LIFE**

The assessment of the proposed development raises significant concerns regarding its impact on both fisheries and marine life. The waters off the West Lewis coast are not only home to a diverse marine ecosystem but also support an active fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from substantial disruption.

A critical flaw within the application is the unsubstantiated assumption that fishing activities can simply be relocated without adverse consequences. There is no evidence provided to suggest that alternative fishing grounds are available or capable of accommodating the additional pressures that displacement would create. This oversight is particularly troubling, as it could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended period is expected to cause widespread disturbance, which may affect species such as dolphins. Alarmingly, the potential disruption to a significant portion of the local bottlenose dolphin population is downplayed in the application, lacking adequate supporting evidence.

There exists a noteworthy inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction calls into question the credibility of the assessment and raises alarms about compliance with the Habitats Regulations, particularly in situations where anticipated harm necessitates legal authorisation.

Moreover, the cumulative impacts resulting from various pressures, such as habitat

disturbance, noise, and the displacement of fishing activities, have not been adequately considered. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall implications for marine ecosystems and socio-economic conditions.

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

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

### **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the project's onshore infrastructure is significantly inadequate and does not take into account the complete range of impacts resulting from this integrated development. The offshore turbines and onshore works are closely interrelated, yet they are evaluated separately, leading to a fragmented approach that obscures the true extent of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland and the construction of a substation in proximity to Stornoway, as well as the necessary access infrastructure through delicate landscapes. These activities entail excavation across deep peat areas, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. Without a thorough assessment of these impacts, there is no comprehensive understanding of the project's overall environmental footprint.

The decision to exclude or postpone the assessment of onshore impacts hampers the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process necessitates that all elements of a project be considered in conjunction; however, the distinct assessment of offshore and onshore components results in a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The current application fails to show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been taken, indicating a significant evidential gap in relation to biodiversity protection.

Concerns about carbon balance are also pertinent. Disturbing peatland has the potential to release stored carbon, which could lead to a carbon debt that contradicts



the aims of renewable energy development. The application does not sufficiently address this matter nor does it prove that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. There is no evidence provided in the application that the requisite consents or processes have been initiated, which brings into question the project's feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project holistically and to demonstrate adequate protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be mitigated or avoided undermines the application's credibility.

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

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

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

Without a thorough evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The necessary evidential standard to exclude any adverse effects beyond reasonable

scientific doubt cannot be satisfied, thereby invoking the precautionary principle and hindering a lawful determination.

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

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

## **TOURISM**

The economy of the Isle of Lewis significantly relies on tourism, which has grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this importance, the application does not model the potential impacts of offshore infrastructure on the tourism sector, particularly concerning visitor numbers, behaviour, or overall economic contributions. The assessment overlooks the industrialisation of the seascape and the potential loss of environmental quality, failing to evaluate how these factors could affect Tourism Gross Value Added and the overall resilience of the local economy.

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

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

From a policy standpoint, the application does not meet the standards of the National Planning Framework 4 regarding economic impact and the necessity of demonstrating a net benefit. It conflicts with strategic objectives that position tourism as a key growth sector and lacks the evidence needed for competent authorities to fully understand the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependency creates

a substantial evidential gap. This deficiency hinders a thorough evaluation of the economic effects and underscores the incompleteness of the application.

## SUMMARY

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

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

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

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

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

Moreover, the proposal threatens to bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative

impacts on tourism are all permanent effects that cannot be mitigated to an acceptable degree.

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

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

### **Additional Comments**

I am from Lewis and was born there. I have moved away to find work and I am extremely dismayed at the profound effect that this proposal will have on our Island.

Why, oh WHY is it going full steam ahead when it has not been authorised? It shown how little these companies care about what local people think. I do not know ONE local family that are for this to be on our doorsteps. I need not go on and on as all the implications are written above. I intended to return home one day to my beloved Island though not sure I will, if this monstrous development occurs not only at sea but on land also.

WE, THE LOCAL PEOPLE OF LEWIS DO NOT WANT THIS

**Yours faithfully,**

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6CD84273

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

**Dear Sir/Madam**

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

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

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

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact due to the large turbines being placed in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy further illustrates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

**ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY**

The Environmental Impact Assessment Report is fundamentally flawed and lacks a comprehensive, transparent, and dependable evaluation of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach compromises the integrity of the assessment, meaning that the impacts described may not accurately reflect the final development, thus hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

Moreover, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans that have yet to be established. Consequently, consent is sought on the premise that environmental damage will be rectified later, obstructing any substantial evaluation of efficacy or assessment of remaining impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigations are clearly outlined prior to any decision-making.

Additionally, there are serious evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This generates uncertainty regarding the magnitude and significance of impacts, particularly when negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies inhibit a lawful and robust appraisal of environmental effects, leaving the competent authority incapable of making an informed decision based on the information provided.

## **ASSESSMENT OF ALTERNATIVES**

The application presents a narrative account of project evolution rather than a structured, evidence-based comparison of alternatives. This lack of analysis is a significant shortcoming, as it does not demonstrate that less harmful options have been identified and assessed in preference to more damaging solutions. Specifically,

there is an absence of a transparent comparison of offshore locations, development scales, and design configurations. The developer has not adequately considered the possibility of placing turbines further offshore, where impacts on visual aspects, ecology, and the coast would likely be mitigated. This is particularly crucial given the sensitivity of the West Lewis coastline and the importance of proximity to shore in determining environmental impacts.

Furthermore, the assessment of cable routing and landfall lacks sufficient evidence that alternative routes have been explored to minimise effects on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to provide a clear avoidance strategy, alongside the lack of comparative analysis, indicates that mitigation by design has not been adequately applied, leading to a reliance on post-design measures. Consequently, the application does not demonstrate that environmental harm has been minimised through careful consideration of site selection, layout, and infrastructure routing. This inadequacy represents a departure from the established mitigation hierarchy, inhibiting the competent authority from determining whether more suitable alternatives exist.

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, which emphasises the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission, reinforcing the overall conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful determination.

## **MARINE ECOLOGY AND PROTECTED SPECIES**

The application presents significant deficiencies in the assessment of marine ecology and protected species, particularly within the context of the West Lewis coastal environment, which is noted for its sensitivity and biological activity. The methodologies employed in the assessment fail to adequately capture crucial information regarding species presence, behaviour, and habitat use, leading to an incomplete understanding of ecological receptors. Consequently, the evidential basis for evaluating impacts is insufficient.

A notable shortcoming involves the treatment of otters, recognised as a European Protected Species. The assessment does not adequately account for their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in a failure to assess the potential impacts of construction-related disturbance, noise, and increased activity. This oversight raises questions about the validity of the conclusions drawn regarding the absence of significant effects on this species.

Further limitations are evident in the evaluation of basking sharks, where reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that suggest



frequent usage of these waters. The lack of integration or proper consideration of such data contributes to an incomplete baseline, undermining the reliability of the conclusions reached.

The methodological flaws present in the assessment mean that the conclusions of negligible or non-significant effects are largely based on assumptions rather than on solid evidence. The absence of sufficient baseline data hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual risks faced by marine species and habitats.

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

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

## **ORNITHOLOGY AND SEABIRD IMPACTS**

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the ornithological assessment related to the development application is materially flawed, containing significant evidence gaps and internal inconsistencies that undermine its conclusions. The application fails to adequately demonstrate that these species will not be adversely affected, despite being located within key foraging areas and migratory pathways. It does not robustly evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application itself; the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the evidence provided.

The assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species that are in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to

underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

From a regulatory standpoint, the application fails to meet the evidential threshold required to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

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

Overall, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such failings prevent a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

## **CULTURAL HERITAGE AND COMMUNITY IDENTITY**

The assessment conducted on the cultural heritage and community identity is significantly flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. This application adopts a simplified view, treating heritage as a collection of isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual relevance within the community.

A notable shortcoming is evident in the handling of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual engagement, yet the assessment categorises them merely as static features, overlooking their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural effects and dismisses their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the enduring bond between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the evaluation, representing a considerable gap. The cultural implications of the

development cannot be fully grasped without considering these essential elements.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, recognised for its distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the credibility of the assessment and fails to align with established principles for participation in decisions that influence cultural and environmental matters.

Additionally, there is a critical procedural oversight in the failure to complete a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligation to assess the social, cultural, and economic effects on the island community. This absence alone renders a lawful determination impossible.

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

In summary, the collective neglect to evaluate living heritage, intangible cultural value, community rights, and statutory duties creates a substantial evidential gap. The cultural consequences of the development have not been adequately examined, leaving the application without a solid foundation for assessing the true cultural cost of the proposal.

## **SOCIAL IMPACTS, HEALTH, AND WELLBEING**

The lack of transparency surrounding the Social Impact Assessment is a critical issue, as the full report commissioned by the developer remains unpublished. This absence of information creates a significant evidential gap, which hinders both public understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research. Available summaries reveal that local residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are not merely speculative; nonetheless, without access to the complete assessment, proper scrutiny of these findings is not possible, limiting the ability to ascertain their significance in the decision-making process.

Furthermore, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with findings from the developer acknowledging "cultural loss." Despite these concerns, such impacts have not been adequately incorporated into the main application or appropriately considered. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is essential for developments of this magnitude, especially when community character and functioning may be at stake. The incomplete dataset provided by the application fails to establish a proper evidential foundation for evaluating 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. It is essential that development supports positive health outcomes and mitigates harm; however, the evidence available suggests the existence of adverse effects that have not been fully disclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

### **SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS**

The assessment of the visual and landscape impacts associated with the proposed development is fundamentally flawed and does not adequately convey the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic views, its undeveloped nature, and a profound sense of isolation. The planned installation of large turbines near the shoreline would impose an overwhelming industrial presence that would drastically alter this landscape, leading to a permanent and irreversible change in its character.

Moreover, the application fails to adequately represent the extent of visual change anticipated. The scale and proximity of the turbines are such that they would overshadow views from residential zones, historic sites, and popular coastal areas. This would significantly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment has not effectively communicated the severity of these impacts or their significance within this sensitive landscape context.

Methodological shortcomings further undermine the evaluation, especially regarding the selection and representation of visual viewpoints. It appears that some viewpoints do not sufficiently capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated,

casting doubt on the assessment's overall reliability.

Additionally, there is a critical oversight in evaluating the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially tied to the Atlantic horizon. The assessment treats these assets in isolation without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which these heritage assets are appreciated and breaking their link to the natural horizon. This not only results in visual impacts but also inflicts broader cultural and spatial damage that the application has not adequately addressed.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent of change proposed is fundamentally incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case scenario assessment further weakens any argument 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 impossible to overlook. The resulting transformation of the landscape is thus fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately reflects the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that this proposal is not compatible with the protection of the landscape.

## **CONSTRUCTION AND POLLUTION RISKS**

The proposal is fraught with serious deficiencies that prevent a thorough evaluation of construction and pollution risks. There is a troubling absence of detailed Construction Environmental Management Plans and Pollution Prevention Plans, essential for a project involving substantial seabed preparation and installation in a challenging Atlantic environment. Instead, the application relies on undefined mitigation and contingency measures, to be formulated after consent, thereby obstructing any meaningful assessment of their effectiveness or adequacy.

This reliance on future, unspecified measures is particularly alarming in light of the West Lewis coastline's sensitivity, which features clean coastal waters and crucial habitats that are susceptible to sediment disruption and contamination. While the application recognises risks such as sediment mobilisation and the potential for chemical or oil spills, it falls short of providing sufficient detail on prevention, control,

or monitoring strategies.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling or clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these potential impacts. This uncertainty also encompasses marine species and habitats deemed sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. The decision to postpone contingency planning until post-consent limits the ability to evaluate whether adequate safeguards will be in place to address pollution incidents. This introduces unnecessary procedural risk and undermines the competent authority's capacity to assess environmental protection measures before making a determination.

Regulatory compliance is also a significant concern, as the deferral of essential environmental safeguards contravenes the Environmental Impact Assessment regime's requirements. It is imperative that likely significant effects and mitigation measures are assessed prior to granting consent; the absence of this information renders a lawful determination impossible. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

Ultimately, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts combine to render the assessment materially deficient. These shortcomings highlight the inability to conduct a robust evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

## **FISHERIES AND MARINE LIFE**

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are

downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

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

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

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

## **ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS**

The assessment of the proposed onshore infrastructure is inadequate and fails to address the full range of impacts associated with what constitutes a single integrated project. There is a fundamental connection between the offshore turbines and the onshore works, yet these components are evaluated in isolation. This fragmented assessment obscures the comprehensive understanding of the environmental and socio-economic repercussions that arise.

The onshore infrastructure encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in regions of deep peat, specifically within Barvas Moor, which serves as a critical carbon store and is an ecologically fragile habitat. The application lacks a thorough assessment of these impacts, which hinders a complete understanding of the overall environmental footprint of the project.

By not adequately addressing the onshore impacts, the application inhibits a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, it is essential that all elements of a project are considered collectively. The current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.



Moreover, there are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policies. The application fails to demonstrate that impacts on these critical habitats have been thoroughly assessed or that suitable avoidance measures are in place, resulting in a concerning evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance related to this proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or provide assurance that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises significant doubts about deliverability and the lawfulness of implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests contradicts the principles outlined in the National Marine Plan and National Planning Framework 4. The inability to establish that adverse impacts can be avoided or mitigated further weakens the credibility of the application.

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

## **DARK SKIES AND NOCTURNAL WILDLIFE**

The lack of assessment concerning dark skies and nocturnal wildlife is a significant omission within the Environmental Impact Assessment, which undermines the integrity of the proposal. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, 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 role dark skies play in the area's identity and the emerging astro-tourism sector, this oversight represents a notable gap in the overall landscape and environmental assessment.

Equally concerning is the absence of any evaluation regarding the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's

Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a heightened risk of collision. The application lacks a lighting impact assessment or a phototaxis study, thereby failing to ascertain how the aviation lighting might affect these species or contribute to increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment is inadequate, as it does not account for nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation caused by artificial lighting; however, this risk remains unassessed. The failure to gather site-specific night-time data creates a critical void in understanding the ecological impacts of the proposal.

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

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

Collectively, the absence of assessments regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The deficiency 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 materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social ramifications for a key 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. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the island has seen substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million. This sector supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this significance, the application does not evaluate how the industrialisation of the seascape and a potential decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or threaten a vital and expanding sector.

Furthermore, the assessment inadequately addresses the critical role of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to visitor experience. The importance of emerging markets, such as nature-based tourism and astro-tourism, is overlooked, and the absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a lack of understanding regarding impacts on a recognised and growing component of the local economy.

The implications extend beyond tourism, affecting employment, local businesses, and community sustainability within an island community that already experiences limited economic diversification. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector, and fails to furnish adequate evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, to evaluate the environmental factors influencing visitor behaviour, and to consider the economic dependency of the island culminates in a significant evidential gap. This gap obstructs 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 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.

### **Additional Comments**

I am in favour of alternative renewable natural energy resources but these colossal wind turbines on this scale will have an immense negative impact on the environment and community in multiple, unexplored, unexamined and currently unconceivable ways

**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: 198798BB

