Member of the public 1886

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. It arises from an examination of the Environmental Impact Assessment Report and accompanying documents, revealing significant shortcomings in planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the western side of the Isle of Lewis, an area noted for its Atlantic-facing coast, near-pristine surroundings, and strong cultural significance. Concerns regarding the scale, proximity, and design of the project fundamentally challenge its adherence to statutory obligations, national policies, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and clarity to provide a reliable account of the likely environmental effects stemming from the proposal. The approach of using a flexible Project Design Envelope, without committing to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This undermines the integrity of the assessment and prevents a consistent worst-case scenario from being applied. As a result, the impacts described may not accurately represent what will ultimately be constructed, which impedes both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

The application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This implies that consent is being sought with the expectation that environmental harm will be addressed later, thereby obstructing any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation measures are clearly established prior to decision-making.

Moreover, there are notable evidential deficiencies, including inadequate baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This introduces uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not comply with statutory obligations.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes mandates for biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The ecological assessment provided lacks the necessary completeness and reliability to understand the ecological receptors in the West Lewis coastal environment. This region is a biologically active marine system, yet the methodologies used have not

sufficiently captured the presence, behaviour, and habitat use of marine species. Consequently, the assessment fails to deliver an evidential basis for evaluating potential impacts.

Significant shortcomings are evident in the treatment of otters, a European Protected Species. The assessment does not adequately acknowledge their use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts from construction activities, noise, and increased human presence are not thoroughly evaluated. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Similar deficiencies are noted in the assessment of basking sharks. The reliance on aerial surveys leads to a substantial detection bias, particularly given the conditions in the Atlantic. This methodology likely underrepresents their presence, especially when contrasted with land-based observations that indicate these waters are used frequently by the species. The failure to integrate or appropriately consider such information contributes to an incomplete baseline and diminishes the credibility of the findings.

These methodological weaknesses result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the requirements established under the Environmental Impact Assessment regime and the National Planning Framework 4, as the necessary identification and assessment of protected species have not been conducted appropriately. The uncertainty generated prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and highlight the overall lack of a sufficient evidential foundation for the application.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks presented in this application is fundamentally incomplete, lacking the necessary detail to properly evaluate the potential environmental effects. Given the proposed substantial seabed preparation and installation works within a high-energy Atlantic environment, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on vague mitigation and contingency measures that are to be formulated post-consent, which severely hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming when considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application prevents a thorough evaluation of whether appropriate safeguards are established to address pollution events. This creates procedural risks and undermines the capability of the competent authority to effectively assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is critical that likely significant effects and associated mitigation measures be assessed prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents serious deficiencies in the assessment of fisheries and marine life, failing to deliver a comprehensive evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a rich marine ecosystem and a vibrant fishing industry, yet the application does not provide assurance that these essential uses and habitats can be preserved or sustained without considerable disruption.

A critical flaw lies in the presumption that fishing activities can be relocated without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or suitable for increased pressure. This gap is

significant because displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and local livelihoods remain unclear.

The risks posed to marine species are also considerable, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period threatens to disturb a wide range of species, notably dolphins. The forecasted disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays the importance of these potential effects, lacking adequate supporting evidence.

Furthermore, the application reveals an inconsistency in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising such impacts as negligible. This contradiction weakens the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include an assessment of dark skies and nocturnal wildlife, resulting in a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over great distances, threatens to create a continuous "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Moreover, there is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning as the significance of dark skies is paramount to the area's identity and has

implications for emerging tourism sectors like astro-tourism. The absence of these assessments results in a considerable gap in the overall evaluation of landscape and environmental impacts.

Equally important, the application neglects to assess the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototaxis behaviour, which can lead to disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means there is no evaluation of how aviation lighting might affect these species or contribute to mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the 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 evaluated. The lack of site-specific night-time data creates a crucial void in understanding the ecological impacts.

Without a proper assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard needed to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thus engaging the precautionary principle and preventing a lawful determination.

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

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

TOURISM

The assessment of tourism impacts is fundamentally inadequate, failing to analyse the economic and social consequences for a vital sector on the Isle of Lewis. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it neglects to provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Nonetheless, the application does not model the potential impacts of seascape industrialisation and loss of environmental quality on Tourism Gross Value

Added or broader economic resilience. Without such analysis, it is impossible to ascertain whether the development would generate a net economic benefit or jeopardise an established and expanding sector.

The assessment also fails to account for the significance of environmental quality in enhancing tourism, specifically the importance of unspoiled landscapes and dark skies to the visitor experience, as well as the growth of markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leading to a considerable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

In an island community with limited economic diversification, the neglect of tourism impacts has broader repercussions for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate adherence to National Planning Framework 4, particularly concerning economic impact and the need to demonstrate net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and recognise the island's economic dependency creates a significant evidential gap. This obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application brings forward the same core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

Procedural failures are evident as well. The lack of a compliant Island Communities

Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to disclose a complete Social Impact Assessment is a notable omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4. It does not demonstrate effective protection for biodiversity, natural landscapes, or cultural heritage. Furthermore, it fails to show that impacts on health and wellbeing are acceptable and lacks evidence of a net economic benefit, particularly due to missing tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

This scale of wind farms should not be allowed in close proximity to homes. This will significantly impact on tourism and also on the quality of life of theocal people. The marine wildlife and land wildlife must also be taken into consideration, noise and light pollution will most certainly impact on the environment and eco systems locally.
If this goes agead ot will impact other coastal areas across Europe and the Uk

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: C70B8363

Member of the public 1887

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

Dear Sir/Madam

This letter is a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and supporting documents, highlighting material deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. It contains missing critical environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal are not clearly defined. The flexible design framework inhibits a clear understanding of likely significant effects, while unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not backed by robust evidence.

There are clear policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, with large turbines positioned near the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the application is significantly flawed, lacking a comprehensive and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is

known for its high sensitivity and biological activity, yet the baseline data is insufficient, and the applied methodologies do not adequately capture key factors such as species presence, behaviour, and habitat use. Consequently, the assessment falls short of providing a solid evidential foundation necessary for impact evaluation.

One major shortcoming is the failure to appropriately assess otters, a European Protected Species, in their use of coastal regions for foraging and movement. The application neglects to account for their core foraging range and behavioural characteristics, which results in a lack of thorough evaluation regarding the potential impacts of construction disturbances, noise, and increased human activity. This oversight directly undermines any assertions made about the absence of significant effects on otters.

Further issues arise in the analysis of basking sharks, where reliance on aerial surveys creates a substantial detection bias, especially under Atlantic conditions. This method is likely to result in an underestimation of their presence, particularly when juxtaposed with established land-based observations that highlight their frequent activity in these waters. The failure to adequately incorporate or consider this data results in an incomplete baseline, thereby diminishing the reliability of the assessment's conclusions.

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

Regulatory compliance is also in question, as the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainty generated precludes the exclusion of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Therefore, under these circumstances, granting consent is not legally permissible.

In conclusion, the presence of incomplete baseline data, inadequate methodologies, and unfounded conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the notion that the application lacks a sufficiently solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application presents significant gaps in evidence and contains internal inconsistencies that fundamentally undermine its conclusions. Notably, the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate, to the required evidential standard, that these species will not be adversely affected. The

development site is situated within key foraging areas and migratory pathways, yet there is an inadequate evaluation of the implications related to displacement, collision risk, or habitat loss.

A critical contradiction arises within the application, as the developer asserts 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 casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly addressed, and reliance on modelling approaches introduces considerable uncertainty, particularly for species experiencing severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in instances where baseline data is incomplete and behavioural responses are not fully understood.

The proposed siting of turbines within a recognised migratory corridor poses an additional and substantial risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently analyse the long-term consequences of sustained mortality within this corridor, nor the potential effects on species with relatively small global populations.

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

In summary, the assessment's internal inconsistencies, methodological weaknesses, and lack of adequate evidence contribute to its overall unreliability. These issues hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for a lawful determination.

FISHERIES AND MARINE LIFE

The application does not provide a comprehensive assessment of fisheries and marine life, resulting in an inadequate evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support a thriving fishing industry. However, the application fails to prove that these vital uses and habitats can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be shifted without repercussions. There is no evidence provided to confirm that alternative fishing grounds are available or viable enough to handle increased pressure. This lack of information is crucial, as the risk of overfishing in other areas is heightened, which could have further economic ramifications for the local fishing fleet. The absence of a thorough and fact-based assessment means the potential impacts on fisheries and the livelihoods they support remain largely unexamined.

Moreover, the proposal presents serious risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over extensive areas, with particular concern for species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarm, yet the application minimizes these impacts without appropriate supporting evidence.

There is an evident contradiction in the application regarding the requirement for licences to allow harm to European Protected Species. While the need for such licences is acknowledged, the impacts are concurrently described as negligible. This inconsistency undermines the validity of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby failing to meet the standards of sustainable development.

In conclusion, the deficiencies present—such as the lack of evidence regarding fishing displacement, the undervaluation of acoustic impacts, and internal contradictions—render the assessment flawed and untrustworthy. These shortcomings hinder a rigorous evaluation of the potential impacts on marine life and fisheries.

TOURISM

The assessment of tourism impacts is critically lacking and fails to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and its sense of seclusion. Although the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

The tourism sector has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or broader economic resilience. Without such crucial analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise a thriving sector.

Moreover, the assessment does not take into account the significance of environmental quality in enhancing tourism, particularly the vital roles of unspoiled landscapes and dark skies in visitor experiences and burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leaving a substantial void in understanding its impacts on a recognised and expanding segment of the local economy.

In light of the island community's limited economic diversification, the oversight in evaluating tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the requirement to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

The cumulative effect of these shortcomings—failing to quantify tourism impacts, neglecting to assess the environmental drivers of visitor behaviour, and overlooking the island's economic dependencies—creates a significant evidential gap. This obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a significant shortfall in meeting the standards of sustainable development when evaluated against statutory obligations, national policy, and required evidence. This application reiterates the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable level of industrialisation. Now, it is introduced under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and the wellbeing of communities.

There are critical deficiencies in the evidential foundation provided for the determination of the application. Key baseline data is missing, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures.

Additionally, the application neglects crucial impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set forth by the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment represents a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, rendering the application unsuitable for determination.

The proposal stands in stark contradiction to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage. There is insufficient evidence to confirm that impacts on health and wellbeing are acceptable, nor can it substantiate a net economic benefit, largely due to the absence of tourism impact analysis. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks remain considerable. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The required evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful determination of acceptable impacts.

This proposal would bring about significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the potential repercussions for tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental concerns, inhibit a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to require the submission of the outstanding information.

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

Additional Comments

I object strongly to the proposed N4 windfarm development on the West Coast of Lewis, where I was born and brought up in Barvas, with family still there, where the

company proposing this has reported and recorded about 700-off Whales, Dolphins, and Porpoises, living in the area where the Canadian company "Northland Power" and Irish company "ESB" are in the planning process to build a giant Nearshore Windfarm of some 900MWe in size. Where they plan 66-off giant turbines each 380mtrs (1,246ft) high from sea level to blade tip and sited only 3 miles from shore in an area fully alive with marine wildlife.
This is also on the migratory route from Iceland to tge UK of the protected Whooper Swans.

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: A513E07F

Member of the public 1888

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings that compromise its reliability in evaluating the environmental implications of the proposal. A key concern is the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty, making it difficult to consistently apply a worst-case scenario. As a result, the assessment lacks integrity, preventing both the public and the competent authority from fully grasping the potential environmental effects of the development that may ultimately occur.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these conditions means environmental harm would only be addressed later, hindering a thorough evaluation of effectiveness or residual impacts. This postponement of critical information contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and the necessary mitigation be clearly established before any determination.

Additionally, there are notable evidential deficiencies, including gaps in baseline data and methodological limitations, compounded by a reliance on assumptions rather than site-specific evidence. This lack of thoroughness results in uncertainty about the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. Such deficiencies prevent a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly for protected species and sensitive habitats. Furthermore, the proposal fails to align with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is impossible to demonstrate that impacts have been thoroughly assessed or that adequate safeguards are established.

In conclusion, the combination of reliance on an undefined design envelope, the lack of specified mitigation measures, and the absence of sufficient baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These inadequacies hinder a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot make an informed decision based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime requires a thorough assessment of alternatives, which the application fails to provide. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application presents a narrative of project evolution. This narrative does not adequately demonstrate that less harmful options have been identified and selected

over more damaging ones.

A lack of transparency and an evidence-based approach is evident in the comparison of alternative offshore locations, development scales, and design configurations. Specifically, there is no indication that the developer has seriously considered positioning turbines further offshore, where visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the importance of proximity to shore in assessing impact. Therefore, the absence of such analysis prevents any determination that the proposed siting is the least damaging available option.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately explored to avoid or lessen impacts on sensitive receptors. Areas of cultural and spiritual significance, such as Barvas Cemetery, have not been properly considered. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, relying instead on measures to mitigate impacts after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This lack of adherence to the established mitigation hierarchy prevents the competent authority from discerning whether less harmful and more suitable alternatives are available. A robust assessment of alternatives is critical, as it cannot be determined that the proposal is a sustainable or policy-compliant solution without it.

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, leading to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it inadequately identifies and assesses protected species. The assessment of marine ecology and protected species presents significant deficiencies, particularly concerning the understanding of ecological receptors within the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the baseline data remains incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat use. Consequently, the conclusions drawn lack a sound evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, classified as a European Protected Species, where the application does not adequately acknowledge their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and

behavioural patterns results in an inadequate assessment of the potential impacts of construction disturbance, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks reveals additional deficiencies, as reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations indicating frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline, weakening the reliability of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thus generating uncertainty regarding the true scale of risk to marine species and habitats.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions compromises the reliability of the assessment. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application does not possess a sufficient evidential foundation. In light of the uncertainty introduced, it cannot be reasonably concluded that adverse effects can be excluded beyond reasonable scientific doubt, thereby engaging the precautionary principle and indicating that consent cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis threatens internationally important seabird populations, which are already experiencing declines. The ornithological assessment associated with the application is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that compromise its conclusions. It fails to adequately demonstrate that these species will not face adverse effects, particularly since the turbines are sited within key foraging areas and migratory pathways. The assessment lacks a robust evaluation of displacement, collision risk, or habitat loss, which is essential for understanding the potential impacts on these vulnerable birds.

Furthermore, the application presents a contradiction by asserting that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that its conclusions are not sufficiently supported by evidence. It does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully acknowledged, and reliance on modelling

approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. Additionally, the methodologies applied likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not well understood.

The placement of turbines in a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term implications of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, fails to achieve the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and undermines a lawful conclusion in favour of consent. Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity presents significant inadequacies, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising these elements, the application adopts a reductive framework that treats heritage as a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual functions within the community.

A notable shortcoming pertains to culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which are active burial grounds and places of spiritual significance. However, the assessment inaccurately categorises these sites as static features, overlooking their continued use and meaning, as well as the potential impact of development on their surroundings. This misrepresentation leads to an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The evaluation fails to encompass intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These components are vital to the area's identity but are wholly omitted from the assessment, representing a critical gap. The absence of these

considerations prevents an accurate understanding of the development's cultural impact.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity with characteristics of an Indigenous People. The lack of a process for Free, Prior and Informed Consent severely undermines the legitimacy of the assessment, neglecting established principles of participation in matters affecting cultural and environmental interests.

Furthermore, a significant procedural failure is the omission of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to fulfil its statutory obligations to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone precludes a lawful determination.

From a policy standpoint, the outlined deficiencies position the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a sound basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing associated with the proposal have not been adequately assessed, resulting in a significant lack of transparency essential for a lawful evaluation. The developer has conducted a Social Impact Assessment, which included focus groups with local residents; however, the absence of the full report creates an evidential gap that hinders both public understanding and the competent authority's ability to assess the social risks highlighted in the developer's own research.

Residents have already reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, with these impacts grounded in direct engagement rather than speculation. Nonetheless, the failure to release the complete assessment limits scrutiny of the findings and impedes the determination of their significance in the decision-making process.

Furthermore, the proposal is viewed by some as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite the identification of these impacts, they have not been adequately incorporated into the main application or given the necessary weight. The decision to withhold the full Social Impact Assessment obscures the actual human and social costs associated with the

development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community are at stake. By not providing the complete dataset, the application does not furnish a comprehensive evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application fails to comply with the National Planning Framework 4 concerning health and wellbeing, which mandates that development should foster positive health outcomes and avoid harm. The evidence available suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

The procedural ramifications are significant, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material shortcoming within the application and violates the evidential standards set forth in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of pre-existing adverse impacts, results in an incomplete and unreliable assessment. This undermines the potential for a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines would be situated in close proximity to the shoreline, introducing a continuous industrial presence that would fundamentally alter this character. This change would result in a permanent and irreversible transformation of the landscape.

The application fails to properly assess the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the natural and remote qualities of the area. The assessment does not adequately convey the significance of these impacts on such a sensitive landscape.

There are also concerns regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This may lead to an understatement of the visual impact, calling into question the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship

between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these assets as isolated, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of their cultural significance and setting.

The proposed industrialisation of the seascape would sever these vital connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This would not only create a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change proposed is incompatible with safeguarding the 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.

Additionally, the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is fundamental and permanent, and cannot be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate likely environmental effects. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental

Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, hindering any meaningful assessment of their adequacy or effectiveness.

The deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether appropriate safeguards are established to respond to pollution incidents. This procedural risk undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation be assessed before consent; without such information, a lawful determination cannot be achieved. The application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents serious deficiencies in the assessment of fisheries and marine life, failing to deliver a comprehensive evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a rich marine ecosystem and a vibrant fishing industry, yet the application does not provide assurance that these essential uses and habitats can be preserved or sustained without considerable disruption.

A critical flaw lies in the presumption that fishing activities can be relocated without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or suitable for increased pressure. This gap is significant because displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and local livelihoods remain unclear.

The risks posed to marine species are also considerable, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period threatens to disturb a wide range of species, notably dolphins. The forecasted disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays the importance of these potential effects, lacking adequate supporting evidence.

Furthermore, the application reveals an inconsistency in acknowledging the necessity

for licences to permit harm to European Protected Species while simultaneously characterising such impacts as negligible. This contradiction weakens the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a complete assessment of onshore infrastructure, which is critical for understanding the full impacts of this integrated project. The offshore turbines and onshore works are connected, yet they have been assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant shortcoming. The proposed development along the West Lewis coastline introduces permanent red aviation lighting, which is visible over extensive distances and creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally impacts the night-time environment, which is characterised by exceptionally dark skies that contribute to the area's environmental quality, cultural identity, and tourism value.

Moreover, the application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical role of dark skies in the region's identity and the emerging sector of astro-tourism, this oversight is particularly concerning. The absence of such assessments indicates a notable gap in the overall evaluation of landscape and environmental impacts.

Importantly, there is no consideration of how artificial lighting affects nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, which may cause disorientation and elevate collision risks. The application does not include a lighting impact assessment or a phototaxis study, thereby neglecting potential effects on these species and their mortality rates.

This omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to reflect nocturnal activities and associated hazards. Additionally, species like Kittiwakes, known to forage or migrate at night, are

similarly at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would experience adverse impacts. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the omission stands in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, given that night-time character is an essential component of the environment.

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

TOURISM

The application's assessment of tourism impacts is significantly lacking and neglects to examine the economic and social effects on a vital sector of the Isle of Lewis economy. With tourism relying heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, the omission of a Dark Skies Assessment further exacerbates this deficiency. While the application acknowledges that 86% of visitors are attracted by scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and contributing up to 16% of the island's economy. However, the application does not model the potential impacts of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it remains uncertain whether the development would yield a net economic benefit or jeopardise a well-established and expanding sector.

The application also neglects to consider the crucial role of environmental quality in fostering tourism, particularly in relation to the significance of unspoiled landscapes and dark skies for visitor experience, as well as for emerging markets like nature-based tourism and astro-tourism. This gap in understanding is especially concerning given the limited economic diversification within the island community, leading to broader implications for employment, local businesses, and community sustainability.

Moreover, the absence of a compliant Island Communities Impact Assessment

highlights that these economic vulnerabilities have not been adequately evaluated, as required under the Islands (Scotland) Act 2018. From a policy standpoint, the application does not prove compliance with the National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This ultimately hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal significantly fails to meet the requirements for sustainable development, as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues identified in the previous 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current proposal is being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential foundation necessary for determination. The application lacks comprehensive baseline data, relies on an undefined design envelope, depends on unspecified mitigation measures, and fails to address essential impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Moreover, clear procedural lapses are present. The lack of a compliant Island Communities Impact Assessment violates the statutory requirements outlined in the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment constitutes a significant omission. These shortcomings impede 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 the principles established in National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. The application fails to show acceptable health and wellbeing impacts and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain ambiguous and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in several areas. The evidential threshold to conclusively exclude 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.

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, disruptions to cultural and visual relationships, and the impacts on tourism represent permanent changes that cannot be adequately mitigated.

In light of these considerations, the application is fundamentally unfit for determination both procedurally and substantively. The multitude of informational deficiencies, policy inconsistencies, and unresolved environmental risks prevent a lawful and evidence-based decision. Therefore, the competent authority must refuse consent based on these grounds or invoke the relevant regulatory measures to obtain the necessary missing information.

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

Additional Comments

This proposed wind farm will totally destroy the Island as we know it. Our heritage and future will be ruined.
The Island infrastructure cannot cope with the impact that this wind farm will cause.
Sea life and birds will suffer.
Little or no financial gain
Pollution
Marine life and fishing decimated.

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: 5ABA78F6

Member of the public 1889

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies present in the Environmental Impact Assessment Report raise significant concerns regarding its reliability and transparency in portraying the potential environmental impacts of the proposal. The application employs a flexible Project Design Envelope that lacks commitment to particular turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. Consequently, the environmental impacts outlined may not accurately represent the final development, which inhibits both public understanding and that of the competent authority regarding the actual extent of environmental effects.

Furthermore, the application leans heavily on mitigation measures, management plans, and monitoring strategies that remain undefined at this stage. As such, the request for consent is predicated on the assumption that environmental harms will be addressed subsequently, preventing any substantive evaluation of their effectiveness or the assessment of residual impacts. This deferral of critical information until after consent is granted is procedurally improper and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly defined before any determination is made.

The report is also marred by significant evidential shortcomings, notably the presence of gaps in baseline data and limitations in the methodology employed, alongside an over-reliance on assumptions rather than site-specific evidence. Such shortcomings result in uncertainty concerning the scale and significance of impacts, particularly where findings indicate negligible or non-significant effects without the requisite supporting data. The lack of comprehensive information impedes a clear understanding of cumulative and worst-case impacts, engendering scientific uncertainty that cannot meet the statutory requirements.

As a result, the application does not satisfy the evidential criteria stipulated under the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to establish that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape

where environment, language, tradition, and community are intrinsically linked. The approach adopted by the application is reductive, treating heritage as a series of isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual function within the community.

A significant deficiency is evident in the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These are active places of burial and spiritual practice, yet the assessment categorises them as static features. This oversight neglects their continued use, meaning, and the potential impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their role within community life.

Moreover, the assessment does not consider intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the evaluation, representing a significant omission. The cultural impact of the development cannot be adequately understood without factoring in these components.

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

Additionally, a critical procedural failure is 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 hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy perspective, the identified deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with a lack of recognition of living cultural practices, constitutes a clear departure from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing raises significant concerns regarding the adequacy of the evaluation process. Although the developer commissioned a Social Impact Assessment that included input from local residents through focus groups, the full report remains unpublished. This creates a substantial evidential gap, inhibiting the public and the competent authority from comprehensively understanding the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct community engagement rather than speculative assumptions. Nonetheless, the non-disclosure of the complete assessment hampers thorough scrutiny of these findings and restricts the ability to assess their importance within the decision-making framework.

Furthermore, the proposal is viewed by many as a direct threat to community identity and cohesion, with findings indicating a risk of "cultural loss." Despite this, these social impacts have not been appropriately integrated into the primary application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The implications for the Environmental Impact Assessment process are serious. To fully understand the social, economic, and health impacts of developments of this magnitude, particularly those that may alter community character, access to the complete dataset is essential. The application does not provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm. However, the evidence that has been made available suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with relevant policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material failure in the application, undermining the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines along the West Lewis coastline, which is characterised by an open Atlantic horizon and an undeveloped, remote character. This development would create a continuous industrial presence that fundamentally alters this landscape, leading to a permanent and irreversible transformation. The assessment of seascape, landscape, and visual impacts associated with this proposal is significantly deficient, failing to capture the scale of change and the sensitivity of the surrounding environment.

The visual change resulting from the turbines would be substantial, dominating views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and degrade the essential qualities of naturalness and remoteness. The assessment does not adequately convey the magnitude of this impact or its significance within such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may overlook the most sensitive receptors and worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This oversight suggests that the true magnitude of the visual impact may be understated, compromising the reliability of the assessment.

Moreover, the assessment inadequately addresses the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that shares visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their settings and cultural significance.

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

From a policy standpoint, this proposal contradicts the directives of National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of change posed by the development is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case scenario analysis further undermines 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 that their presence is dominant and unavoidable. Consequently, the changes brought about by this proposal are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

Overall, the assessment fails to accurately depict the extent of impact, the sensitivity of

the environment, and the interrelated nature of landscape and heritage. These deficiencies hinder a reliable evaluation and highlight that the proposal is not compatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application proposes significant onshore infrastructure related to an integrated project involving offshore turbines and associated works. However, the assessment of the onshore elements is materially incomplete, failing to consider the full extent of impacts. The onshore works encompass cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As a result, the application does not provide a thorough evaluation of the environmental footprint, preventing a complete understanding of the project's impacts.

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

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

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

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

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

In conclusion, the separation of project components, the absence of a comprehensive

assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, preventing a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged within the application that 86% of visitors are attracted by scenery; however, there is no 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, 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 island's economy. Despite this growth, the application neglects to model the potential impacts of industrialisation of the seascape and the loss of environmental quality on Tourism Gross Value Added or on the wider economic resilience of the community. Without such an analysis, it remains impossible to ascertain whether the proposed development would result in a net economic benefit or undermine an established and expanding sector.

Moreover, the assessment disregards the critical role of environmental quality in supporting tourism, including the significance of unspoiled landscapes and dark skies for enhancing visitor experience and for emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a notable gap in the understanding of impacts on a recognised and burgeoning part of the local economy.

In light of the island community's limited economic diversification, the failure to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit net benefit. Additionally, it conflicts with strategic objectives that identify tourism as a priority growth sector and falls short in providing sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency obstructs a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal embodies a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. This application revives the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Now, it is being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are serious shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and overlooks crucial impact pathways, such as those affecting nocturnal wildlife, the full extent of 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.

The proposal also demonstrates clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty as outlined in the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a significant gap. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

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

Environmental risks associated with this proposal remain uncertain and could be significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the invocation of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Furthermore, 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 of cultural and visual relationships, and negative impacts on tourism represent permanent changes that cannot be mitigated to an acceptable level.

In summary, the application is unfit for determination both procedurally and substantively. The multitude of information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct the ability to arrive at a lawful, evidence-

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

Thus, 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: 59D3D96A

Member of the public 1890

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment requirements. The basis of this objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The size, location, and design of the wind farm present serious issues regarding their compliance with statutory obligations, national policies, and the overarching principles of sustainable development.

The application is fundamentally flawed due to its failure to present sufficient evidence for a lawful decision. Notably, essential environmental data is absent, baseline information provided is limited and inconsistent, and crucial elements of the proposal lack clear definition. The flexible design framework used raises doubts about the understanding of significant impacts, while the reliance on unspecified mitigation strategies hampers any assessment of their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts lack credible substantiation.

Additionally, the application reveals substantial conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. There is no evidence to demonstrate that national obligations regarding the protection of biodiversity, climate considerations, and environmental integrity can be fulfilled. These inconsistencies directly affect the statutory tests necessary for consent, thereby compromising the capability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposed development raises further concerns, with large turbines positioned unnervingly close to the shore, leading to significant worries about landscape capacity, visual impact, and environmental consequences. In light of the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and does not support a lawful decision. Under these circumstances, it is imperative that the precautionary principle is applied.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts lacks depth and does not adequately capture the significant changes expected nor the sensitivity of the surrounding environment. The coastline of West Lewis features an expansive Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The proposed installation of large turbines near the shoreline would create an overwhelming industrial presence that would fundamentally alter this landscape, leading to a permanent change.

Moreover, the application does not fully convey the extent of this visual alteration. The size and location of the turbines would dominate views from residential properties, historical sites, and popular coastal areas, affecting visual amenity and detracting from the qualities of naturalness and remoteness. The assessment does not effectively demonstrate the impact's significance within such a sensitive landscape.

There are concerns regarding how visual viewpoints were chosen and presented. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, questioning the assessment's reliability.

Another significant shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected to the Atlantic horizon through visual and spatial relationships. The assessment regards these sites as separate entities rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural value.

The industrialisation of the seascape would disrupt these relationships, altering how heritage sites are perceived and severing their connection to the natural horizon. This results in both visual and broader cultural harm that has not been adequately evaluated in the application.

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

It is also evident that the identified impacts cannot be sufficiently mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting change is therefore substantial and enduring, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of the impact, the sensitivity of the environment, and the interconnected nature of landscape and

heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal does not align with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The lack of detailed management plans raises significant concerns regarding the proposed works' environmental impact. The proposal entails substantial seabed preparation and installation within a high-energy Atlantic environment; however, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures to be established post-consent, which prevents any meaningful evaluation of their adequacy or effectiveness.

The sensitivity of the receiving environment exacerbates these issues. The West Lewis coastline is home to clean coastal waters and habitats that are particularly vulnerable to disturbances caused by sediment and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these risks will be prevented, managed, or monitored.

There is considerable uncertainty regarding 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 potential impacts. This uncertainty also extends to the potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application hinders an assessment of whether appropriate safeguards are in place to address pollution events. This approach not only introduces procedural risks but also undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, deferring crucial environmental safeguards is in direct conflict with the Environmental Impact Assessment regime's requirements. It is essential to assess likely significant effects and mitigation measures prior to granting consent. When such critical information is absent, a lawful determination cannot be achieved. The application also fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the deficiencies associated with undefined mitigation measures, the lack of detailed management plans, and the uncertainties surrounding potential impacts culminate in a materially deficient assessment. These shortcomings preclude a robust evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed excessively industrial. Presenting this application within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the underlying deficiencies.

The evidential basis for the proposal is incomplete and unreliable. Critical gaps in baseline data are evident, as is the continued utilisation of an undefined design envelope. Furthermore, the reliance on unspecified mitigation measures and the omission of significant impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, contribute to an Environmental Impact Assessment that is fundamentally inadequate. This lack of thoroughness hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are also apparent. The absence of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment constitutes a significant omission. Such deficiencies inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and there is a lack of evidence regarding net economic benefits, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals reveal inconsistencies. The evidential threshold required to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been satisfied, thereby engaging the precautionary principle and inhibiting lawful conclusions regarding acceptable impacts.

Additionally, the proposal would result in 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 permanent changes that cannot be sufficiently mitigated.

In summary, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, compounded by conflicts with policy and

unresolved environmental risks, prevent a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory provisions to require the submission of the necessary 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

I would normally be pro renewables but after seeing the size of the proposed windmills and the close proximity I wish to object. It would destroy the landscape and the impact of noise would have a huge affect on nearby communities. The wind farm would have no direct gain for the local area so we would just suffer with no benefits.

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: F6732E2E

Member of the public 1891

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Serious concerns arise from the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

Critical deficiencies are evident in the application, as it lacks an adequate evidential basis for a lawful determination. There are significant gaps in environmental data, and the available baseline information is both limited and inconsistent. Several key aspects of the proposal remain undefined, compounded by the use of a flexible design framework that hinders a clear understanding of the likely significant effects. Additionally, the reliance on unspecified mitigation measures prevents a proper assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are also clear and substantial conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal as acceptable from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The cumulative effect of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a number of significant deficiencies that undermine the credibility of the Environmental Impact Assessment Report. A flexible Project Design Envelope is proposed, lacking specific turbine dimensions, layouts, or configurations,

which introduces considerable uncertainty. This ambiguity hinders a consistent worst-case scenario application, thereby compromising the integrity of the assessment. Consequently, the impacts described may not accurately represent the development that is ultimately realised, obstructing both public understanding and the competent authority's ability to grasp the true environmental implications.

Moreover, the proposal heavily depends on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. As consent is sought on the basis that these environmental harms will be addressed later, this prevents any meaningful evaluation of their effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent stages contradicts the procedural intent of the Environmental Impact Assessment regime, which mandates that significant effects and corresponding mitigation must be established clearly before any determination is made.

Additionally, the report suffers from serious evidential deficiencies. There are notable gaps in baseline data and limitations in the methodology employed, with a tendency to rely on assumptions rather than site-specific evidence. This leads to uncertainty regarding 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 clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

As a result, the application fails to meet the evidential threshold set by the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, particularly regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In conclusion, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, meaning the competent authority cannot make a well-informed determination based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is profoundly lacking, failing to provide a comprehensive and reliable understanding of the ecological receptors within the highly sensitive and biologically active marine environment of West Lewis. The methodologies employed are inadequate, leading to incomplete baseline data that does not effectively capture the presence, behaviour, and habitat use of various

species. Consequently, this assessment does not offer a solid evidential basis for evaluating potential impacts.

One significant shortcoming pertains to otters, classified as a European Protected Species. The application does not appropriately recognise or assess their active use of coastal areas for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, means that the potential impacts of construction disturbance, noise, and increased activity remain inadequately evaluated. This lack of consideration undermines any conclusions drawn about 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. Such an approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations indicating their frequent use of these waters. The failure to adequately incorporate or consider this crucial data contributes to an incomplete baseline, further weakening the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The insufficiency of baseline data also hinders a meaningful assessment of cumulative and indirect impacts, such as seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. This level of uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment that is characterised by significant gaps in evidence and internal inconsistencies, leading to an undermining of its conclusions. The west coast of the Isle of Lewis is known to support internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected, as required by the evidential standard. It is critical to note that the development is situated within key foraging areas and migratory

pathways, yet the assessment does not sufficiently evaluate the implications of displacement, collision risk, or habitat loss.

There exists a crucial contradiction within the application where the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions reached are not substantiated by the evidence provided. The assessment lacks adequate evidence to support the claim that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces an element of uncertainty, particularly concerning species in severe decline, including Kittiwakes and Fulmars. The methodologies employed appear to underestimate mortality, especially where baseline data is incomplete and behavioural responses are inadequately understood.

The positioning of turbines within a recognised migratory corridor poses an additional and substantial risk, effectively establishing a barrier within a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality within this corridor, nor does it consider the potential effects on species with relatively small global populations.

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

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

In summary, the assessment is unreliable due to internal inconsistency, methodological weaknesses, and inadequate evidence. These flaws impede a robust evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements essential for supporting determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application does not adequately assess cultural heritage and community identity, particularly along the West Lewis coastline. This area is a living cultural landscape, where the environment, language, tradition, and community are interconnected. Instead of recognising these relationships, the application treats heritage as isolated, static assets, failing to acknowledge their ongoing social, cultural,

and spiritual significance within the community.

A major oversight is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual practice, yet the assessment categorises them as static features, overlooking their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the role these sites play in community life.

Furthermore, the application neglects to assess intangible cultural heritage elements, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but are completely missing from the assessment, constituting a significant omission. Without addressing these factors, the cultural impact of the development cannot be fully understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds 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 validity of the assessment and fails to adhere to established principles for participation in matters affecting cultural and environmental interests.

A critical procedural error is the omission of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone hampers lawful determination.

From a policy standpoint, the deficiencies in the application conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the lack of recognition of living cultural practices indicate a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern. 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 lack of access creates a substantial evidential gap, which hinders the public and the competent authority from fully grasping the range of

social risks identified through the developer’s own research.

Reports indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct engagement with the community and are not speculative in nature. The decision to withhold the full assessment restricts meaningful scrutiny of the findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these impacts have not been thoroughly incorporated into the main application nor given the appropriate weight they deserve. The absence of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This deficiency in transparency has implications for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a solid evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm. However, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This gap represents a significant omission in the application and signifies a failure to satisfy the evidential requirements dictated by the Environmental Impact Assessment regime.

In conclusion, the withholding of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, landscape, and seascape impacts lacks thoroughness and does not adequately account for the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The

planned introduction of large turbines in close proximity to the coast would lead to a continuous and predominant industrial presence, fundamentally altering this character and effecting a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately depict the extent of this visual change. The size and location of the turbines would overshadow views from residential properties, historical sites, and frequently visited coastal areas. Consequently, this would adversely affect visual amenity and diminish the inherent qualities of naturalness and remoteness. The assessment does not sufficiently articulate this impact or its importance within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the actual visual impact has been understated, thereby compromising the credibility of the assessment.

Additionally, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape framework that links them visually and spatially to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of 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 situation presents not merely a visual impact but also a broader cultural and spatial detriment that has not been adequately evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural areas and historical assets. The anticipated level of change contradicts the necessity to protect landscape character, visual amenity, and the context of culturally important sites. The lack of a thorough worst-case analysis further diminishes any assertions of compliance with policy.

It is evident that the identified impacts cannot be sufficiently mitigated. Given the scale, height, and proximity of the turbines, their presence would be overpowering and unavoidable. The change is thus fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

Collectively, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on unspecified future measures raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination. The application has acknowledged various risks, including sediment mobilisation and accidental chemical or oil spills, yet it fails to provide adequate detail on the strategies needed to prevent, control, or monitor these risks.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, but it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, which hinders any meaningful assessment of their adequacy or effectiveness.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes generated by 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 encompasses potential effects on marine species and habitats that are already recognised as sensitive within the wider assessment.

Moreover, the absence of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application fails to allow for evaluation of whether adequate safeguards are in place to address pollution incidents. This approach not only introduces procedural risk but also 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 outlined by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks and reinforce the argument 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. Alarmingly, 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.

TOURISM

The application presents a materially deficient assessment of tourism impacts, overlooking 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 sense of remoteness. Despite acknowledging that 86% of visitors are attracted by scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality in fostering tourism, including the necessity of unspoiled landscapes and dark skies for enhancing visitor experiences, as well as the growing markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in the understanding of impacts on a recognised and burgeoning segment of the local economy.

In the context of an island community characterised by limited economic diversification, the failure to evaluate tourism impacts holds broader consequences for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the requirement to show net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal.

Ultimately, the inability to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependency culminates in a significant evidential gap. This hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development 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

This project should be further away from local communities.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8FB05123

Member of the public 1892

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

Dear Sir/Madam

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

The application lacks an adequate evidential basis for lawful determination. There are significant gaps in critical environmental data, with baseline information being both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The use of a flexible design framework complicates the assessment of likely significant effects, and reliance on unspecified mitigation measures raises doubts about their effectiveness. Consequently, the provided documentation does not facilitate a comprehensive understanding of potential environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not substantiated by robust evidence.

There are notable policy conflicts that further complicate the application. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary 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, featuring large turbines situated close to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information, dependence on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report fails to provide a complete and reliable account of the likely environmental effects of the proposal. Significant uncertainty arises from the use of a flexible Project Design Envelope, which does not commit to

specific turbine dimensions, layouts, or configurations. This lack of commitment prevents a consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that is ultimately built, limiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

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 later inhibits any meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates a clear establishment of likely significant effects and mitigation prior to determination.

There are also substantial evidential gaps present, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies generate uncertainty regarding the scale and significance of impacts, especially in instances where 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, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been fully assessed or that adequate safeguards are in place.

Overall, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The application submitted does not satisfy the necessary requirements of the Environmental Impact Assessment regime and the National Planning Framework 4 due to significant deficiencies in the assessment of marine ecology and protected species. This inadequacy stems from the failure to fully identify and assess the presence and behaviour of ecological receptors within the West Lewis coastal environment, a region known for its biological activity and sensitivity. The baseline data provided is incomplete, and the methodologies employed do not accurately reflect species presence, behaviour, and habitat use.

A particularly notable gap in the assessment is the treatment of otters, a species

protected under European law. The application neglects to adequately acknowledge their active use of coastal areas for foraging and movement. Consequently, the evaluation fails to consider the core foraging range and behavioural patterns of otters, leading to an insufficient assessment of potential impacts from construction disturbance, noise, and increased activity. This oversight significantly undermines any conclusions drawn regarding the absence of significant effects on this species.

Additionally, the evaluation of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic as it introduces a significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the actual presence of basking sharks, especially when juxtaposed with land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or adequately address such data culminates in an incomplete baseline that diminishes the reliability of the conclusions drawn.

Due to these methodological flaws, any conclusions suggesting negligible or non-significant effects rest on mere assumptions rather than on solid evidence. The lack of sufficient baseline data further impedes a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This scenario engenders uncertainty about the actual risks posed to marine species and habitats.

Considering these factors collectively, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species and confirm that the application lacks a sufficient evidential foundation. Thus, in light of the introduced uncertainties that prevent the exclusion of adverse effects beyond reasonable scientific doubt, consent cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a flawed ornithological assessment characterised by significant gaps in evidence and internal contradictions that undermine its conclusions. Located within key foraging areas and migratory pathways, the development's impact on the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, is inadequately demonstrated. There is no robust evaluation of the potential implications of displacement, collision risk, or habitat loss associated with this project.

A troubling contradiction arises as the developer claims no significant adverse effects while simultaneously advancing 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 unsupported by the available evidence.

Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to

protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these critical feeding grounds is not fully considered, and the reliance on modelling approaches introduces additional uncertainty, especially for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality, particularly where baseline data is incomplete and behavioural responses are poorly understood.

The proposed siting of turbines within a recognised migratory corridor introduces further risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term implications of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not 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 data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and renders a lawful conclusion in support of consent impossible.

The identified deficiencies also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy.

Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and culminate in the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is profoundly insufficient, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interwoven. The application reduces heritage to mere isolated assets, failing to recognise their dynamic social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice, yet they are mischaracterised as static features in the assessment, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This inadequate portrayal leads to a flawed evaluation of cultural effects, ignoring their vital role in community life.

Additionally, the assessment does not take into account intangible cultural heritage elements, including the Gaelic language, traditions, and the deep-rooted relationship

between the community and its coastal environment. These aspects are crucial to the area's identity yet are entirely excluded from consideration, marking a significant shortfall. Without evaluating these factors, the cultural ramifications of the development remain unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that meets the recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not align with established principles of participation in matters affecting cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings position the proposal in stark contradiction to National Planning Framework 4, especially concerning the safeguarding of historic assets and places. Ignoring both tangible and intangible heritage and failing to recognise living cultural practices signifies a significant deviation from policy requirements.

In summary, the shortcomings in assessing living heritage, intangible cultural values, community rights, and legal obligations create a considerable evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application raises significant concerns regarding the assessment of social impacts, health, and wellbeing, which is markedly deficient and lacks the necessary transparency for a lawful evaluation. While the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This creates a considerable 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 available indicate that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These reported impacts stem from direct community engagement, which underscores their legitimacy. Nevertheless, the absence of the complete assessment curtails proper scrutiny of the findings and limits the determination of their significance within the decision-making process.

Furthermore, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Unfortunately, these significant impacts have not been properly integrated into the main application or given the weight they deserve. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development.

This lack of transparency seriously undermines the Environmental Impact Assessment process, where a comprehensive understanding of social, economic, and health impacts is critical, especially for developments that could affect community character and functioning. The application fails to provide a complete evidential basis for assessing the balance between potential benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence points to existing adverse effects that remain inadequately disclosed. Consequently, it cannot be established that the application complies with this policy without the full assessment.

The procedural ramifications of these shortcomings are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission is material within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This shortfall obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant shortcomings in its assessment of the seascape, landscape, and visual impacts, failing to adequately address 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 and undeveloped nature, contributing to a strong sense of remoteness. The introduction of large-scale turbines situated near the shoreline would establish a continuous industrial presence, thereby fundamentally transforming this character and resulting in a permanent alteration of the landscape.

Moreover, the assessment does not sufficiently depict the magnitude of the visual changes anticipated. The proximity and size of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. It fails to convey the significance of this impact within the context of a highly sensitive

landscape.

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

A critical oversight is the lack of assessment regarding the interconnected relationship between the landscape, seascape, and cultural heritage. Prominent sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape setting intertwined with the Atlantic horizon. The assessment treats these heritage assets as isolated entities, neglecting their interdependence and leading to an incomplete evaluation of the impacts on their settings and cultural significance.

The proposed industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This does not merely represent a visual impact but signifies broader cultural and spatial harm that remains inadequately assessed within the application.

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

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

Collectively, these deficiencies highlight a failure to accurately convey the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. This lack of reliable evaluation reinforces the conclusion that the proposal is not compatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application proposes a development that significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these vital uses and habitats can be protected or

maintained in the face of potential disruptions.

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. As a result, without an evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended timeframe is likely to disturb species over large distances, notably impacting the local bottlenose dolphin population. Concerns regarding the predicted disturbance to a significant proportion of these dolphins are serious, yet the application appears to downplay these effects without providing adequate supporting evidence.

There is also an evident inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing such impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

The assessment is lacking in its consideration of cumulative impacts resulting from various pressures, such as 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 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 mitigate unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal aligns with the principles of sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and the tourism sector. The introduction of

permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly important as dark skies are integral to the area’s identity and to emerging sectors like astro-tourism. The omission results in a significant gap in the landscape and environmental assessment.

More importantly, there is no analysis of how the proposal would impact nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, which can disorient them and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, leading to a failure to determine how aviation lighting may affect these species or contribute to increased mortality rates.

The use of daytime survey data in the ornithological assessment further complicates the situation, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. They also weaken the overall assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

In conclusion, the lack of any assessment concerning dark skies and nocturnal wildlife represents a major 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 of tourism impacts is notably inadequate, lacking a thorough evaluation of the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area’s wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified

analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the total economic contribution.

Significant growth in tourism has been observed, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this crucial analysis, it remains unclear whether the development would yield a net economic benefit or adversely affect a well-established and expanding sector.

Furthermore, the assessment does not acknowledge the critical role that environmental quality plays in tourism, such as the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

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

From a policy perspective, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity of proving net benefit. Additionally, it contradicts strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the lack of quantification of tourism impacts, failure to evaluate environmental factors influencing visitor behaviour, and disregard for the economic dependency of the island culminate in a significant evidential gap. This hinders a comprehensive assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The 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

Come to the Isle of Lewis every year to stay with my best friend.

The appeal of the island is its natural calming beauty, and this wind farm will be visible from all of the west side of the island, destroying the views, never mind the natural habitat of countless marine life and sea birds.

All for the benefit of international companies, thousands of miles away from the Isle of Lewis.

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: 369C010F

Member of the public 1893

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is set to be located off the west side of the Isle of Lewis, a region renowned for its Atlantic-facing coastline, nearly untouched natural environment, and deep-rooted cultural identity. Concerns regarding the scale, proximity, and design of this development raise serious questions about its alignment with statutory requirements, national policies, and the core principles of sustainable development.

The application itself lacks an adequate evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is scarce and inconsistent, and several key facets of the proposal are still not clearly defined. Moreover, the use of a flexible design framework obscures the understanding of potential significant impacts, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community repercussions, leaving unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with established policy frameworks. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and public health. It does not successfully illustrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts fundamentally challenge the statutory tests necessary for consent and compromise the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of this proposal poses additional concerns, with large turbines planned in close proximity to the shoreline, raising serious issues about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate. It does not offer a clear or trustworthy account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes and layouts, creates considerable uncertainty. This uncertainty hinders a consistent worst-case scenario application and undermines the assessment's integrity. As a result, the potential impacts presented may not accurately reflect the final development, limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

The application depends significantly on mitigation measures and management plans that remain undefined. Seeking consent based on the promise to address environmental harm later prevents a thorough evaluation of these measures' effectiveness and the assessment of any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's aim, which is to establish significant effects and mitigation clearly before any determination is made.

There are serious evidential shortcomings, including insufficient baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty about the scale and significance of impacts. Conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of comprehensive information obscures understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental effects, meaning that the competent authority cannot properly determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal suffers from significant deficiencies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of viable alternatives based on their environmental impacts, the application provides a narrative account of the project's evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging ones.

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

These shortcomings also extend to cable routing and landfall assessments, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and insufficient 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 demonstrate that environmental harm has been adequately minimised through considerations of site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be definitively stated that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies significantly undermine compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission, leading to the overall conclusion that the application has not been thoroughly evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is seriously flawed, failing to deliver a comprehensive and dependable understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically rich marine system, yet the baseline data provided is lacking, and the methodologies employed do not adequately document species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

Notably, there is a significant oversight concerning otters, which are a European Protected Species. The application neglects to properly acknowledge and assess their use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate evaluation of the potential impacts of construction disturbance, noise, and increased activity, thereby undermining any claims regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks reveals further weaknesses, as reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when contrasted with established land-based observations that indicate frequent usage of these waters. The failure to properly incorporate or consider such crucial data results in an incomplete baseline, ultimately diminishing the credibility of the conclusions drawn.

The limitations in methodology mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than rigorous evidence. The insufficient baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced by these deficiencies obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies impede a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. The application fails to demonstrate that these species will not be adversely affected, and this omission is particularly concerning given that the development is situated within key foraging areas and migratory pathways. The ornithological assessment is significantly flawed, containing considerable gaps in evidence and inconsistencies that undermine its conclusions.

A contradiction exists where the developer asserts there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not underpinned by solid evidence. Furthermore, the assessment does not provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling techniques

adds uncertainty, particularly for species like Kittiwakes and Fulmars that are already in severe decline. The methodologies employed are likely to underestimate potential mortality, especially when baseline data is incomplete and the behavioural responses of the species are not fully understood.

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

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to confirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data deficiencies and limitations in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and hinders a lawful conclusion in favour of consent.

Overall, the identified deficiencies signify a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse impacts places the proposal in direct opposition to national policy. In conclusion, the assessment is deemed unreliable due to internal inconsistencies, methodological shortcomings, and insufficient evidence, which together prevent a robust evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is fundamentally a living cultural landscape, where the environment, language, tradition, and community are closely intertwined. However, the assessment of cultural heritage and community identity in the application is fundamentally inadequate, as it treats heritage as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming of the assessment is its handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet the assessment categorises them as static features, neglecting their continued use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their vital role in community life.

Moreover, the application fails to address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity, yet they are entirely omitted from the assessment, which constitutes a significant oversight. Without acknowledging these factors, it becomes impossible to fully understand the

cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which has a distinct cultural identity that aligns with recognised characteristics of Indigenous Peoples, has not been engaged in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles of participation in decisions affecting cultural and environmental interests.

A further procedural failing is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This oversight alone renders a lawful determination impossible.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not present a sufficient foundation for understanding the true cultural costs 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 the visual and landscape impacts associated with the proposal is fundamentally lacking and does not adequately capture the degree of change or the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, conveys a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would introduce a significant industrial presence, fundamentally altering this character and causing a permanent transformation of the landscape.

Moreover, the application fails to accurately represent the scale of visual change. Given their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would not only affect visual amenity but also diminish the essential qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact, failing to consider the sensitivity of the landscape adequately.

Concerns arise from the methods used to select and present visual viewpoints. Evidence indicates that the chosen viewpoints may overlook the most sensitive receptors and fail to depict worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This risks underestimating the visual impact, which compromises the credibility of the assessment.

Another significant oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape

context, linked visually and spatially to the Atlantic horizon. By treating these assets as isolated, the assessment neglects their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and disconnecting them from the natural horizon. This represents not just a visual impact but also a cultural and spatial harm that the application fails to assess properly.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the preservation of natural landscapes and historical assets. The proposed scale of change does not align with the requirements to protect landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case scenario assessment undermines claims of policy compliance.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the anticipated change is not something that can be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The absence of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans raises significant concerns regarding the proposal's adherence to environmental protection standards. The project entails extensive seabed preparation and installation in a challenging high-energy Atlantic environment, yet relies on unspecified mitigation and contingency measures that are to be developed after consent. This approach fundamentally undermines any meaningful evaluation of the potential adequacy and effectiveness of these measures.

Particularly troubling is the sensitivity of the receiving environment, which includes the West Lewis coastline characterised by clean coastal waters and important habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, managed, or monitored effectively.

Moreover, there exists a notable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of such impacts. This

uncertainty further extends to the possible effects on marine species and habitats that are already recognised as sensitive in the broader assessment context.

The situation is exacerbated by the lack of detailed emergency response procedures. Deferring contingency planning until post-consent prevents a thorough evaluation of whether adequate safeguards are in place to manage pollution incidents effectively. This introduces procedural risks and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in implementing essential environmental safeguards is inconsistent with the mandates of the Environmental Impact Assessment framework. It is imperative that significant effects and mitigation strategies are evaluated prior to granting consent; without such information, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

Collectively, the failure to articulate defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These shortcomings 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 both a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life associated with the application is inadequate, lacking a thorough evaluation of ecological and socio-economic impacts. A significant flaw is the assumption that fishing activity can be displaced without consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure. This lack of information is critical, as the risk of displacement could lead to overfishing elsewhere, potentially resulting in wider economic repercussions for the local fleet. Consequently, without a clear, evidence-based assessment, the effects on fisheries and livelihoods remain unclear.

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

There exists a troubling inconsistency within the application, as it acknowledges the necessity of licences to permit harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction undermines

the credibility of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where harm is expected to an extent that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The fragmented assessment of the proposed project fails to consider the interconnected nature of the offshore turbines and the associated onshore works. This separation obscures the full extent of environmental and socio-economic impacts, creating an incomplete evaluation. The application inadequately addresses the critical assessment of onshore infrastructure, which is vital for understanding the project's overall environmental footprint.

The onshore infrastructure includes cabling that crosses protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in deep peat areas, particularly within Barvas Moor, recognised as an important carbon store and ecologically sensitive habitat. Without a comprehensive assessment of these impacts, the application hinders a full understanding of the project's consequences.

Significant risks to sensitive habitats are evident, particularly in machair systems and peatland environments, both of which are protected under policy. The application fails to adequately assess the impacts on these habitats or implement appropriate avoidance measures, highlighting a notable gap in biodiversity protection.

Moreover, the proposal raises serious concerns regarding carbon balance. Disturbance of peatland can release stored carbon, leading to a potential carbon debt that undermines the very objectives of renewable energy development. The application does not sufficiently address this critical issue or prove that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights, raising questions regarding the deliverability and lawful implementation of the project. The application lacks evidence that the necessary consents or processes have been initiated, complicating matters further.

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

In summary, the separation of project components, the absence of a thorough assessment, and a lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, preventing a lawful determination. Immediate action is required to rectify these issues.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a critical gap within the Environmental Impact Assessment. The coastline of West Lewis is renowned for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism, particularly in relation to the growing sector of astro-tourism. The proposal introduces permanent red aviation lighting that would be visible over vast distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the identity of the area. The lack of consideration for these impacts leads to a considerable gap in the overall assessment of the landscape and environment.

More alarmingly, there is no examination of how the proposed lighting will affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, resulting in a failure to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and 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 not been addressed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The necessary evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and hindering lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the natural setting.

In summary, the failure to assess dark skies and nocturnal wildlife leads to a significant evidential deficiency. 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 inadequately assesses tourism impacts and neglects to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. The area's tourism is fundamentally reliant on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenery, yet there is no quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island’s economy. Despite this progress, the application fails to consider how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without such an evaluation, it remains unclear whether the proposed development would provide a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a major gap in understanding the impacts on this acknowledged and growing component of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate impacts on tourism has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been duly examined as mandated by the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, failure to assess environmental influences on visitor behaviour, and disregard for the island's economic dependence culminate in a significant evidential gap. This deficiency 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 reflects a significant failure to meet the requirements for sustainable development as dictated by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in several key areas.

There are serious deficiencies in the evidence provided for assessment. The proposal lacks a comprehensive and reliable evidential basis, with critical gaps in baseline data and the use of an undefined design envelope. It relies on unspecified mitigation measures and neglects to address important impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings. The omission of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment represents a significant oversight. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

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

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are

incomplete and at times internally inconsistent. The evidential standard needed to dismiss 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.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either denies consent based on these grounds or exercises the appropriate regulatory measures to require the submission of the necessary missing information. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

Having grown up in Carloway, Isle of Lewis, I spent my childhood summers at local beaches. Growing up and having grown up, I think the Lewis coastline is some of the most stunning I have come across. Over the years I have brought many friends from various parts of the world to Lewis and they have all been bowled over by the sheer beauty of the seascape and shoreline along the west coast.

I do not doubt that the planned turbines would be useful, but the detrimental impact on the locality for many, many reasons would be far greater.

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: D8F2C7F0

Member of the public 1894

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough examination of the Environmental Impact Assessment Report and its supporting documentation reveals several material deficiencies related to planning, the environment, cultural heritage, and procedural aspects. The development site, situated off the west side of the Isle of Lewis, is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The substantial scale and proximity of the proposal, along with its design, raise significant concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There is critical environmental data missing, and the baseline information provided 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 potential significant effects. Furthermore, the reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. As a consequence, the documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are clear and substantial conflicts with existing policies. The proposal 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. It fails to prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to deem the development acceptable in terms of policy.

The unprecedented scale of the proposal raises additional concerns, as large turbines would be positioned too close to the shoreline, leading to significant implications for landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance demonstrate that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally 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 application presents significant inadequacies in its assessment of alternatives, failing to meet the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of

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

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the developer has not shown that serious consideration has been given to positioning turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in evaluating impact, the absence of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

These deficiencies extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been employed, relying instead on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species for the West Lewis coastal environment is fundamentally inadequate, failing to provide a complete understanding of ecological receptors in this sensitive and biologically rich marine system. The methodologies employed are insufficient, leading to incomplete baseline data that do not reliably capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

The assessment notably overlooks otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement, failing to consider their core foraging range and behavioural patterns. This gap in understanding means that the potential effects of

construction disturbance, noise, and increased activity on otters have not been properly assessed, undermining any conclusions regarding the absence of significant effects on this species.

Similar deficiencies are evident in the assessment of basking sharks, where reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, thus compromising the reliability of the conclusions drawn.

These methodological shortcomings render conclusions of negligible or non-significant effects based more on assumptions than on robust evidence. Furthermore, the absence of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variation and interactions within the broader ecosystem. This creates uncertainty about the true scale of risk posed to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and indicate that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with this development is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. Despite the development being situated within key foraging areas and migratory pathways, the application fails to adequately evaluate the potential impacts of displacement, collision risk, or habitat loss on these vital species.

There exists a critical contradiction within the application, as the developer claims that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that the conclusions drawn are unsupported by the available evidence. The assessment inadequately addresses whether seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, with

a lack of thorough consideration given to the importance of these feeding grounds. The reliance on modelling approaches further introduces uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars.

Moreover, placing turbines within a recognised migratory corridor poses an additional and substantial risk, effectively creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term repercussions of sustained mortality in this corridor or the potential impacts on species that have relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold needed 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 activates the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

The identified deficiencies also suggest non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to convincingly 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 lack of sufficient evidence render it unreliable. These shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfill the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous and overwhelming industrial presence, which would fundamentally alter this character and lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately represent the magnitude of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

There are significant methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment. Additionally, the assessment does not adequately evaluate the

interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial harm that has not been sufficiently assessed within the application. From a policy standpoint, the proposal conflicts directly with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation measures. In conclusion, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is markedly deficient and lacks the necessary detail to properly evaluate potential environmental effects. The proposed activities entail significant seabed preparation and installation operations within a high-energy Atlantic environment, yet there are no well-developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on future mitigation and contingency measures that will be established after consent, which hinders any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures is especially troubling given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, managed, or monitored.

There is also ambiguity surrounding the scale and behaviour of sediment plumes that could result from seabed disruption and cable installation. Without comprehensive modelling and clearly defined management strategies, it is impossible to ascertain the

extent, duration, or ecological implications of these disturbances. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents any evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces a procedural risk and undermines the ability of the competent authority to assess environmental protection measures effectively at the determination stage.

From a regulatory standpoint, the delay in implementing critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are evaluated prior to consent; without this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Ultimately, the lack of defined mitigation measures, the absence of comprehensive management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal is fundamentally flawed due to several critical deficiencies in its assessment of fisheries and marine life, which do not adequately address ecological or socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application fails to provide assurances that these vital uses and habitats will be protected from significant disruption.

One of the major shortcomings of the proposal is the assumption that fishing activity can simply be displaced without repercussions. The application lacks any evidence to support the claim that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure that displacement would cause. This oversight is crucial, as it poses a risk of overfishing in alternative areas and could have broader economic implications for the local fishing fleet. Without a comprehensive, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain obscure.

The application further jeopardises marine species, particularly due to the underwater noise expected from construction activities. The high-energy hammer piling proposed is likely to generate disturbances that extend over considerable distances, impacting species such as dolphins. Concerns are particularly raised regarding the predicted effects on a significant portion of the local bottlenose dolphin population. Despite

these serious implications, the application downplays these impacts without providing adequate supporting evidence.

A notable inconsistency exists within the application itself, acknowledging the necessity of licenses to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction raises questions about the validity of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to a degree that necessitates legal approval.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not substantiate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, ultimately failing to establish that the proposal represents sustainable development.

In summary, the combination of inadequate evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment fundamentally incomplete and unreliable. These shortcomings obstruct a meaningful evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents serious deficiencies in the assessment of onshore infrastructure, which is materially incomplete and fails to encompass the full extent of impacts associated with what constitutes a single integrated project. The interconnection between offshore turbines and onshore works has been overlooked, leading to a fragmented analysis that obscures the true scale of the environmental and socio-economic consequences.

Onshore elements, including cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure, traverse sensitive landscapes. Significant excavation across deep peat areas, particularly within Barvas Moor, poses threats to this vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which inhibits a complete understanding of the project's overall environmental footprint.

Moreover, the exclusion or deferral of onshore impact assessments compromises the ability to evaluate cumulative effects accurately. According to the Environmental Impact Assessment process, it is essential that all project components are reviewed collectively. The current approach, which separates offshore and onshore elements, fails to capture the combined impacts on peatlands, habitats, and surrounding

communities.

Sensitive habitats, such as machair systems and peatland environments, face considerable risks that are meant to be protected under policy. The application has not demonstrated a full assessment of impacts on these habitats or provided sufficient avoidance measures, resulting in a clear evidential gap concerning biodiversity protection.

There are also significant concerns regarding carbon balance. The disruption of peatland could release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this matter, failing to confirm that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land introduces conflicts with established land use and legal rights. The application does not offer evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This oversight is particularly concerning given the vital role that dark skies play in the area’s identity and the potential for developing tourism sectors like astro-tourism. Such omissions create a clear gap in the overall landscape and environmental assessment.

More alarmingly, there has been no evaluation of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel

are highly sensitive to artificial lighting due to phototaxis, leading to disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that the application does not account for how aviation lighting may adversely affect these species or contribute to increased mortality rates.

This deficiency is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. 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 is at odds with National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

Ultimately, the lack of any assessment concerning dark skies and nocturnal wildlife renders the application incomplete and incapable of supporting a lawful determination, owing to the absence of baseline data, impact modelling, and species-specific analysis.

TOURISM

The application does not adequately assess the impacts of tourism, which is a crucial sector for the Isle of Lewis economy. Tourism relies heavily on the area’s wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Notably, 86% of visitors are attracted by the scenery, yet there is no quantified evaluation of how large-scale offshore infrastructure could potentially alter visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has seen substantial growth, with its value rising from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application fails to model the impact that the industrialisation of the seascape and the consequent loss of environmental quality would have on Tourism Gross Value Added and the wider economic resilience. Without this critical analysis, it remains unclear whether the development would provide a net economic benefit or harm an established and expanding sector.

Furthermore, the assessment neglects to consider how environmental quality

underpins tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experience and emerging sectors like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on this increasingly important part of the local economy.

In an island community that has limited economic diversification, the lack of an assessment of tourism impacts bears wider implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, contrary to requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially regarding economic impacts and the necessity to demonstrate net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Collectively, these deficiencies in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and considering the island's economic dependency create a substantial evidential gap. This situation hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm raises serious concerns regarding sustainable development, failing to meet the necessary statutory duties, national policy, and evidential standards. This application echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, as it presents an unacceptable level of industrialisation despite a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant shortcoming of the application is its lack of a complete and reliable evidential basis for determination. Key gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted impact pathways concerning nocturnal wildlife, full onshore infrastructure, and tourism effects compromise the integrity of the Environmental Impact Assessment. This inadequacy prevents a comprehensive understanding of the potential significant effects or residual impacts of the proposal.

Moreover, there are evident procedural failures. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment constitutes a material omission, hindering the competent authority's

ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal also contradicts the National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not adequately address health and wellbeing impacts or provide evidence of a 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 thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals, along with internal inconsistencies, indicate that the necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, preventing any lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is therefore requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I am concerned about this project because the full impact of projects such as this one have not been fully measured and the living beings nearby will be severely affected by this project.

Developers should present complete plans with all and any outcomes specified in details and should be held to account if the plans do not detail the affect that the project is highly likely to have on anything living nearby.

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: 9BBF9029

Member of the public 1895

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

Dear Sir/Madam

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a vibrant cultural landscape in which environment, language, tradition, and community are deeply interwoven. The application adopts a simplistic view, treating heritage as isolated, static assets rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is found in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely static features; they are active locations for burial and spiritual practices. However, the assessment incorrectly categorises them, overlooking their ongoing significance, usage, and the implications of development on their surroundings. This flawed interpretation leads to an inadequate evaluation of cultural effects and dismisses their importance in community life.

Moreover, the application neglects the assessment of intangible cultural heritage, which includes the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity but are entirely omitted from the assessment, marking a substantial oversight. Without acknowledging these elements, the cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity with characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and fails to adhere to established principles of participation in matters that affect cultural and environmental interests.

There is a critical procedural failing in the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The omission of this assessment means that the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic ramifications for the island community. This alone undermines lawful determination.

From a policy perspective, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy requirements.

When considered collectively, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The application does not adequately assess the cultural impacts of the development, nor does it provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment fundamentally undermines the evaluation of social impacts, health, and wellbeing related to this proposal. The developer has commissioned a Social Impact Assessment that included local residents in focus groups; however, the complete report remains unpublished. This significant

evidential gap prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research.

Summaries that are available reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are therefore not speculative. The lack of transparency regarding the full assessment restricts proper scrutiny of the findings and hinders the ability to assess their importance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer indicating a risk of "cultural loss." Despite this recognition, such impacts have not been adequately integrated into the main application or given the necessary attention. The failure to disclose the complete Social Impact Assessment thus obscures the true human and social costs associated with the development.

The implications for the Environmental Impact Assessment process are substantial. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be jeopardised. The application, by withholding this vital information, lacks a complete evidential basis to appropriately evaluate the balance between benefits and detriments.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 regarding health and wellbeing. Development must foster positive health outcomes and prevent harm; however, the evidence available suggests the existence of adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a critical omission within the application and a failure to satisfy the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation hinders a lawful determination and reinforces the argument that the application does not rest on sufficient information.

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 proposal lacks sufficient detail regarding the assessment of construction and pollution risks, making it impossible to properly evaluate the potential environmental effects. Significant seabed preparation and installation works are planned for a high-energy Atlantic environment; however, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, obstructing any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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 not feasible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of the onshore infrastructure, which is materially incomplete. It neglects to consider the full scope of impacts resulting from what constitutes a single integrated project. The offshore

turbines and onshore works are intrinsically connected; however, their separate assessments lead to a fragmented understanding that obscures the true scale of environmental and socio-economic effects.

Among the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and associated access infrastructure that traverses sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, an area recognised for its ecological sensitivity and as a significant carbon store. The absence of a thorough evaluation of these impacts inhibits a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application hinders an appropriate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered in conjunction. However, the distinct treatment of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal also raises significant concerns regarding sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, thus highlighting a substantial evidential gap in relation to biodiversity protection.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the environmental quality, cultural identity, and tourism value of the area. However, the Environmental Impact Assessment lacks any evaluation of dark skies and nocturnal wildlife, which constitutes a material omission. The proposal incorporates permanent

red aviation lighting that is visible over extensive distances, resulting in a disruptive "wall of light" effect across the western horizon that would significantly alter the night-time environment.

There has been no assessment of how this lighting would affect visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and the growing tourism sector focused on astro-tourism. The absence of consideration for these factors leads to a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a lack of analysis regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and heightened collision risks. The application does not present any lighting impact assessment or phototaxis study, failing to investigate how aviation lighting may influence 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 activity or the associated risks. For instance, Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting. However, this risk has not been evaluated. The lack of site-specific night-time data creates a significant void in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is 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 fulfilled, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, they undermine the comprehensive assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

The economic impact of tourism on the Isle of Lewis is critically significant, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the assessment conducted by the application is profoundly deficient, failing to adequately evaluate how

large-scale offshore infrastructure may affect visitor numbers, behaviour, or overall economic contributions. It is acknowledged that 86% of visitors are attracted by the area's stunning scenery, yet there is no quantified analysis to demonstrate how the industrialisation of the seascape and a decline in environmental quality could influence tourism's Gross Value Added or the broader economic resilience of the island.

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm embodies a critical shortfall in fulfilling the principles of sustainable development as mandated by statutory duties and national policy. This application echoes the fundamental issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, it is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

The evidential basis provided in the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope persists. There is an overreliance on unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are overlooked. Consequently, the Environmental Impact Assessment remains unfinished, hindering a comprehensive understanding of significant effects and residual impacts.

Moreover, clear procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while failing to disclose a full Social Impact Assessment constitutes a serious omission. These failings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

In conclusion, the application is procedurally and substantively unsuitable for determination. The multitude of information gaps, in conjunction with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or activate the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

I am normally supportive of renewable energy initiatives and am proud of how Scotland prioritises clean energy where possible. However, I believe this project brings too many risks and threats to the local area that cannot possibly be offset by any supposed benefits. Local residents have a right to feel safe and enjoy the place they have chosen to live as much as anyone - the social impact of this project to an area like this simply cannot be underestimated or overlooked. It is unconscionable to place such an immense burden on this area, which would be obvious if due diligence had been

applied to any of the aforementioned impact assessments. I trust that the authority will see sense and do the right thing.

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: A43DAAC5

Member of the public 1896

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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 provide an adequate assessment of alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of presenting a structured and reasoned comparison based on environmental effects, it offers a narrative account of the project's evolution. This approach does not demonstrate that less harmful options have been properly identified, assessed, and

preferred over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. The West Lewis coastline's sensitivity and the critical importance of proximity to shore in assessing impact highlight the need for such analysis; without it, there can be no conclusion that the proposed siting is the least damaging option.

The inadequacies also extend to cable routing and landfall assessment, where insufficient evidence exists to show that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas with cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposal presents an assessment of marine ecology and protected species that is notably deficient, failing to provide a comprehensive and dependable understanding of the ecological receptors within the West Lewis coastal environment. This marine system is biologically active and sensitive, yet the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species, leading to a lack of sound evidential basis for impact evaluations.

A significant gap exists regarding otters, which are classified as a European Protected Species. The application neglects to properly acknowledge and assess their use of coastal areas for foraging and movement. This oversight concerning their core foraging range and behavioural patterns results in a failure to adequately evaluate the potential impacts of construction disturbance, noise, and increased activity, thus undermining conclusions regarding the absence of significant effects on the species.

The assessment of basking sharks also demonstrates shortcomings, as the reliance on aerial surveys introduces substantial detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly in contrast to established land-based observations that indicate frequent usage of the waters. The lack of incorporation or proper consideration of such relevant data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings indicate that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on robust evidence. Furthermore, the insufficient baseline data hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty concerning the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. The level of uncertainty introduced in this evaluation prevents the exclusion 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 renders the assessment unreliable. These significant deficiencies inhibit a thorough evaluation of the impacts on marine ecology and protected species, ultimately leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a flawed ornithological assessment characterised by significant gaps in evidence and internal contradictions that undermine its conclusions. Located within key foraging areas and migratory pathways, the development's impact on the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, is inadequately demonstrated. There is no robust evaluation of the potential implications of displacement, collision risk, or habitat loss associated with this project.

A troubling contradiction arises as the developer claims no significant adverse effects while simultaneously advancing 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 unsupported by the available evidence.

Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The

importance of these critical feeding grounds is not fully considered, and the reliance on modelling approaches introduces additional uncertainty, especially for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality, particularly where baseline data is incomplete and behavioural responses are poorly understood.

The proposed siting of turbines within a recognised migratory corridor introduces further risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term implications of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not 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 data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and renders a lawful conclusion in support of consent impossible.

The identified deficiencies also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy.

Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and culminate in the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the assessment approaches cultural heritage in a reductive manner, viewing it as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

Notably, the evaluation does not adequately consider culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are active sites of burial and spiritual practice, yet the assessment regards them as mere static features, disregarding their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural ramifications and overlooks their importance in community life.

Additionally, the intangible aspects of cultural heritage, including the Gaelic language, traditions, and the enduring bond between the community and the coastal environment, are not taken into account. These elements are vital to the area's identity,

yet they are conspicuously missing from the assessment, resulting in a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains unexamined.

There are pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity and the characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of genuine engagement calls into question the validity of the assessment and neglects essential principles of participation in matters that affect cultural and environmental interests.

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

From a policy standpoint, these shortcomings conflict directly with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In conclusion, the neglect to assess living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application without a solid foundation for understanding the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that compromises the integrity of the planning application. The developer's own focus groups with local residents indicate that there are measurable levels of stress, anxiety, and concern regarding the proposal’s scale and proximity. These impacts, derived from direct engagement, highlight an ongoing situation that cannot be dismissed as speculative. However, the absence of the full report hampers the ability of both the public and the competent authority to understand the comprehensive social risks identified.

This lack of transparency also extends to the perceived threat the proposal poses to community identity and cohesion, with “cultural loss” explicitly mentioned in the developer's findings. Yet, these serious concerns have not been adequately reflected in the main application, nor have they been given the attention they warrant. By withholding the complete Social Impact Assessment, the true human and social costs associated with the development remain obscured.

The implications for the Environmental Impact Assessment process are profound. A

thorough understanding of the social, economic, and health impacts is essential for developments of this magnitude, especially when considering potential effects on community character and functioning. Without access to the full dataset, the application lacks a robust evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not comply with the National Planning Framework 4 regarding health and wellbeing. It is imperative for developments to support positive health outcomes and mitigate harm. The existing evidence of adverse effects, which has not been fully disclosed, calls into question the application's adherence to this policy.

Furthermore, the procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This oversight represents a material omission in the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the failure to disclose the full Social Impact Assessment, coupled with clear evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation undermines the possibility of a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 evaluation of construction and pollution risks lacks the necessary detail to assess likely environmental impacts. The proposal entails significant seabed preparation and installation work in a high-energy Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be created after consent, which obstructs any thorough assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises serious concerns due to the sensitive nature of the receiving environment. The West Lewis coastline hosts clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without solid modelling and clearly defined management strategies, it is impossible to establish the extent, duration, or ecological effects of these impacts. This uncertainty extends to possible effects on marine species and habitats previously recognised as sensitive in the wider assessment.

The lack of detailed emergency response procedures further complicates these issues.

By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether suitable safeguards are in place to deal with pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, delaying critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and their mitigation must be evaluated prior to consent. When such information is absent, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the absence of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts result in a materially deficient assessment. These issues hinder a thorough evaluation of construction and pollution risks and reinforce the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the proposal's impacts on fisheries and marine life is inadequate, lacking a comprehensive assessment of both ecological and socio-economic factors. The waters along the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not convincingly show that these vital habitats and fishing activities will be preserved without significant disruption.

A significant concern is the presumption that fishing activities can be shifted without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from this displacement. This gap is crucial, as it raises the risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and well-substantiated evaluation, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to underwater noise associated with construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances that could affect a wide range of species, including dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimizes these impacts without adequate 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 the impacts as negligible. This contradiction raises serious questions regarding compliance with the Habitats Regulations, especially since harm is expected at a level that necessitates legal authorisation.

The assessment does not adequately consider cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently establish that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal is sustainable.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the presence of 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 evaluation of the onshore infrastructure is significantly incomplete and does not consider the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are closely connected, yet their assessment occurs in isolation. This leads to a fragmented approach, masking the true extent of both environmental and socio-economic consequences.

The onshore components encompass cabling that runs across protected moorland, the construction of a substation located near Stornoway, and the required access infrastructure through sensitive landscapes. These activities involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which obstructs a complete understanding of the overall environmental footprint of the project.

By omitting or postponing the assessment of onshore impacts, the application precludes a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project are reviewed collectively; however, the disjointed assessment of offshore and onshore components leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application fails to show that impacts on these vital habitats have been fully evaluated or that suitable avoidance measures have been implemented. This reveals a substantial evidential gap concerning biodiversity protection.

Furthermore, 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 requisite consents or processes have been initiated, which raises concerns about the feasibility and legality of the proposed implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over long distances, threatens to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. This significant change is not addressed in the application, which neglects to assess the impact on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and to the burgeoning sector of astro-tourism, this omission raises serious concerns.

Moreover, there is a glaring absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. Without any lighting impact assessment or phototaxis study, the application fails to evaluate how aviation lighting may affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not take into account nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting. Yet, this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude such adverse effects beyond reasonable scientific doubt cannot be met, thus invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission is in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it

undermines a comprehensive assessment of landscape and seascape impacts, as the character of night-time forms an integral part of the environment.

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

TOURISM

The proposed development presents significant concerns regarding its impact on tourism, a vital part of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Tourism on the island has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and making up to 16% of the island's economy. However, the application does not adequately model how the industrialisation of the seascape and the decline in environmental quality could affect Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the development would provide a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment neglects to consider how environmental quality underpins tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a significant gap in understanding the impacts on a vital aspect of the local economy.

Given the limited economic diversification in the island community, the failure to evaluate tourism impacts raises broader concerns for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means 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 the National Planning Framework 4, particularly concerning economic impacts and the necessity to show net benefits. It also contradicts strategic objectives that prioritise tourism as a key growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependencies results in a significant gap in evidence. This lack of thorough evaluation hinders a

proper understanding 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 as outlined by statutory duties, national policy, and evidential standards. It mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a concern. This new application is presented within a stronger policy framework that places significant emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

The proposed development would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts

on tourism are permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or employ the relevant regulatory provisions to obtain the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F399AAB9

Member of the public 1897

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 deficiencies present in the Environmental Impact Assessment Report render it materially inadequate, as it fails to offer a full, transparent, or reliable overview of the proposal's likely environmental effects. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty obstructs the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts described may not correspond to the development that is ultimately realised, which in turn hinders both public understanding and the competent authority's ability to ascertain the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed subsequently precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a deferral of crucial information to post-consent phases is procedurally unacceptable and conflicts with the core objectives of the Environmental Impact Assessment regime. This regime mandates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

There are also considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects are presented without robust supporting data. The insufficient information prevents an accurate understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that are irreconcilable with statutory obligations.

As a result, the application does not satisfy the evidential standards required under the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, specifically in relation to biodiversity protection and environmental integrity. It cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of clear mitigation measures, and the existing gaps in baseline data culminate in an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The lack of a thorough and evidence-based assessment of alternatives severely undermines the application’s compliance with the Environmental Impact Assessment

regime. It does not provide a structured and reasoned comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative of project evolution that fails to demonstrate that the developer has identified and considered less harmful options in favour of more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is significantly inadequate, failing to provide a comprehensive and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for assessing impacts.

One crucial shortcoming involves otters, classified as a European Protected Species. The application neglects to appropriately recognise and evaluate their active use of

coastal regions for foraging and movement. The failure to consider their core foraging ranges and behavioural patterns results in an inadequate assessment of potential impacts from construction disturbances, noise, and increased activity. This gap undermines any assertions regarding the absence of significant effects on otters.

In addition, the evaluation of basking sharks is flawed; reliance on aerial surveys leads to substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The oversight in incorporating relevant data culminates in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data also hampers a meaningful assessment of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it does not correctly identify or assess 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 conditions, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment pertaining to the proposed development is fundamentally unreliable, featuring significant internal inconsistencies and gaps in evidence that severely undermine its conclusions. This development is situated in critical foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected, failing to meet the evidential standard required for such assertions.

Moreover, there exists a stark contradiction within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency calls into question the trustworthiness of the assessment, highlighting that the conclusions drawn are not substantiated by the

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in this application is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The approach taken reduces heritage to isolated, static assets and neglects their ongoing social, cultural, and spiritual functions within the community.

A significant deficiency is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are inaccurately categorised as static features. This mischaracterisation overlooks their continued use and meaning, as well as the impact of development on their setting. Consequently, the cultural effects are evaluated incompletely, disregarding the integral role these sites play in community

life.

Moreover, the assessment fails to address intangible cultural heritage, which includes the Gaelic language and local traditions, alongside the long-standing relationship between the community and its coastal environment. These elements are central to the area's identity but are omitted from the analysis, which represents a significant gap. Without including these factors, it is impossible to fully comprehend the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with recognised characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation concerning cultural and environmental interests.

Another critical issue 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 fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy perspective, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition of living cultural practices, constitutes a clear deviation from required policy standards.

In summary, the overall neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application fails to provide a sound basis for evaluating the true cultural cost associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing related to the proposal is insufficient and lacks necessary transparency. While the developer conducted a Social Impact Assessment, including focus groups with local residents, the complete report has not been made public. This results in a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of social risks identified by the developer's research.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts arise from direct engagement with the community and are not merely speculative. However, without disclosing the complete assessment, proper scrutiny of the findings is not

possible, which limits the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer's findings. Unfortunately, these effects have not been fully considered in the main application or given the appropriate weight they deserve. The decision to withhold the full Social Impact Assessment obscures the actual human and social costs associated with the development.

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

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, but the available evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The implications of these procedural shortcomings are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material failure within the application and does not meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment inadequate and unreliable. This lack of comprehensive information hinders a lawful determination, reinforcing the conclusion that the application does not rest on sufficient evidence.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented is critically flawed, failing to accurately capture the significant impacts on seascape, landscape, and visual integrity. The West Lewis coastline, characterised by its open Atlantic horizon and untouched nature, possesses a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would impose a continuous industrial presence, drastically transforming this unique character and causing an irreversible change to the landscape.

Significantly, the application does not sufficiently illustrate the extent of this visual change. The sheer scale and proximity of the turbines would overpower views from residential areas, historic landmarks, and popular coastal spots, directly diminishing visual amenity and compromising the area's intrinsic qualities of naturalness and

remoteness. The assessment inadequately conveys the magnitude of this impact, which is especially concerning given the delicate nature of the landscape involved.

Methodological issues further complicate the evaluation, particularly regarding the choice and portrayal of visual viewpoints. Existing evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially in relation to important cultural heritage sites and landscapes of high value. This shortcoming raises doubts about the accuracy of the reported visual impacts, leading to an underestimation that undermines the credibility of the assessment.

Moreover, there is a notable failure to consider the interconnectedness of the landscape, seascape, and cultural heritage. Iconic sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape framework that connects them visually and spatially to the Atlantic horizon. Treating these heritage assets in isolation neglects their interdependence, resulting in a superficial understanding of the implications for their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, fundamentally altering how these heritage sites are perceived and disrupting their ties to the natural horizon. This concern extends beyond mere visual impact; it also encompasses a significant cultural and spatial harm that has not been thoroughly examined in the application.

From a policy standpoint, this proposal is at odds with the National Planning Framework 4, which aims to protect natural spaces and historic sites. The extent of the proposed changes is inconsistent with the need to maintain landscape character, visual amenity, and the settings of culturally significant areas. Additionally, the lack of a comprehensive worst-case impact assessment further discredits any assertions of policy compliance.

Ultimately, the identified impacts are such that they cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be unavoidable and dominate the landscape. This leads to a fundamental and permanent alteration that cannot be diminished to an acceptable level through any mitigation efforts.

In summary, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These substantial deficiencies preclude a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the preservation of this significant 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

incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided with the application. Instead, it relies on mitigation and contingency measures that are to be prepared after consent is granted, which hinders any meaningful evaluation of their adequacy or effectiveness.

This situation is particularly alarming 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 sediment disturbance and contamination. While 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.

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

The lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning to a post-consent stage, the application obstructs any evaluation of whether the necessary safeguards are in place to address pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the determination stage.

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

Collectively, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These issues obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application exhibits a troubling contradiction, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously claiming that such impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, particularly in instances where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is notably inadequate, lacking a

thorough evaluation of the ecological and socio-economic consequences. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to convincingly demonstrate that these essential uses and habitats can be preserved or maintained without considerable disruption.

A critical issue is the presumption that fishing activity can be relocated without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or able to endure added pressure. This significant omission poses risks of overfishing in other locations, which may lead to broader economic ramifications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Additionally, the proposal introduces considerable risks to marine species, especially through the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended timeframe is likely to disturb marine life across considerable distances, affecting species such as dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application tends to downplay the importance of these effects without adequate supporting evidence.

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

From a policy standpoint, the application fails to demonstrate 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 avoid unacceptable impacts on marine biodiversity. This lack of compliance hinders 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 it incomplete and unreliable. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be reviewed collectively; however, the separation of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

TOURISM

The assessment of the potential impacts on tourism is severely lacking, overlooking crucial economic and social implications for a vital sector of the Isle of Lewis economy. The economy here relies heavily on tourism, which thrives on the area's wild coastline,

almost untouched landscapes, dark skies, and overall sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the application fails to provide a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviours, or the overall economic contributions of tourism.

Tourism has experienced substantial growth, escalating from £65 million in 2017 to more than £81.5 million, thereby supporting over 1,000 jobs and making up to 16% of the island's economy. Nonetheless, the application neglects to explore how the anticipated industrialisation of the seascape and subsequent decline in environmental quality could affect Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or risk undermining a vital and expanding sector.

Furthermore, the assessment inadequately addresses the significance of environmental quality in nurturing tourism, particularly highlighting how unspoiled landscapes and dark skies enhance visitor experiences and promote emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

Within the context of an island community that has limited economic diversification, the failure to properly evaluate tourism impacts raises broader concerns 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 duly assessed, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially regarding economic impacts and the necessity of illustrating net benefits. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to gauge the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a significant evidential gap. This omission hampers a thorough evaluation of economic effects, supporting the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application recalls the issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level 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 application does not adequately address these concerns.

There are significant gaps in the evidence provided, with a reliance on an undefined design envelope and unspecified mitigation measures. Key impact pathways, particularly concerning nocturnal wildlife, the entirety of the onshore infrastructure, and tourism effects, have been omitted. This incomplete Environmental Impact Assessment fails to provide a comprehensive understanding of likely significant effects or any residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of a full Social Impact Assessment is a critical oversight. Such omissions hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts National Planning Framework 4 by not demonstrating protection for biodiversity and cultural heritage. It also fails to show that health and wellbeing impacts are acceptable and lacks evidence for a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, clouding understanding of effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties around environmental risks are potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

This proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and adverse impacts on tourism will result in permanent effects that cannot be mitigated satisfactorily.

Overall, the application is unfit for determination both procedurally and substantively. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority must refuse consent for this application or utilise relevant regulatory provisions to require the submission of the necessary missing information.

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

Additional Comments

Completely ruining the tranquility of life here. Apart from that no consideration given to views about effects on health etc. The size of those turbines are astronomical and not acceptable to any locals. There's a reason we live on an island and we certainly don't want the industrialisation this is bringing which will bring no benefit whatsoever to any locals . We are not getting any benefit from these wind farms but lining other people's pockets with money. Nobody in their right minds could agree to this. If the Government are so keen on them then let them have them on their own doorsteps on the mainland after all they are the only people benefitting from them, I strongly object to this happening ruining a beautiful island and much else

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: 0DFBBACE

Member of the public 1898

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. A major concern is the employment of a flexible Project Design Envelope, which lacks fixed turbine dimensions, layouts, or configurations. This uncertainty hinders the ability to consistently apply a worst-case scenario, thus undermining the integrity of the assessment. Consequently, the impacts reported may not accurately reflect those of the actual development, limiting both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application depends extensively on unspecified mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these circumstances implies that any environmental harm will be addressed subsequently, obstructing a thorough evaluation of their effectiveness or the assessment of any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable, as it contradicts the Environmental Impact Assessment regime's requirement for significant effects and mitigation to be clearly established prior to determination.

There are also noteworthy evidential gaps, including insufficient baseline data and methodological limitations, leading to an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty about the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of robust information compromises the understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that does not align with statutory requirements.

Due to these issues, the application does not satisfy the evidential standard mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot prove that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an ill-defined design envelope, the absence of clearly specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents a significant inadequacy in the assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. It offers a narrative account of project evolution rather than a structured,

reasoned comparison of realistic alternatives based on their environmental effects. This method does not demonstrate that less harmful options have been adequately identified, assessed, and selected in favour of more damaging solutions.

A transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations is notably absent. Specifically, the application does not establish that the developer has seriously contemplated placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies further extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. 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 inadequacy undermines compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is seriously lacking, failing to deliver a thorough or dependable understanding of the ecological receptors in the West Lewis coastal area. This region represents a highly sensitive and biologically vibrant marine environment. However, the baseline data is incomplete, and the methodologies employed do not adequately capture critical information on species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for assessing potential impacts.

An important shortfall in the application is the insufficient recognition and evaluation of otters, which are classified as a European Protected Species. The assessment does not properly account for their active foraging and movement within coastal areas. By neglecting to consider their core foraging range and behavioural patterns, the potential

impacts arising from construction disturbances, noise, and increased activity have not been sufficiently evaluated. This gap undermines the conclusions drawn regarding the absence of significant effects on otters.

Deficiencies also emerge in the evaluation of basking sharks, where reliance on aerial surveys introduces a notable detection bias, especially under Atlantic weather conditions. This methodology is likely to result in an underestimation of their presence, particularly when compared to established land-based observations that indicate regular utilisation of these waters. The failure to incorporate or adequately consider this data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that any assertions of negligible or non-significant effects rest on assumptions rather than substantial evidence. The lack of sufficient baseline data also hampers meaningful evaluations of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty engendered by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings impede a thorough evaluation of impacts on marine ecology and protected species, further supporting the assertion that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to satisfy the evidential threshold necessary to establish no adverse effect on the integrity of protected sites. This deficiency is underscored by the presence of contradictory conclusions, coupled with significant gaps in data and limitations inherent in the modelling approaches utilised. As a result, the standard of beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and hindering a lawful conclusion in support of consent.

The ornithological assessment is fundamentally flawed, exhibiting substantial gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. Yet, the application fails to meet the required evidential standard demonstrating that these species will not face adverse effects. Key foraging areas and migratory pathways are situated within the proposed development,

yet the assessment neglects to thoroughly evaluate the potential implications of displacement, collision risk, or habitat loss.

There exists a critical contradiction within the application, whereby the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment lacks adequate evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars that are in critical decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are inadequately understood.

The placement of turbines within a recognised migratory corridor presents an additional and considerable risk, effectively establishing a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or consider the potential impact on species with relatively small global populations.

The identified deficiencies also reflect a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological inadequacies, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of the 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 evaluation of community identity and cultural heritage is fundamentally insufficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplified viewpoint, treating heritage as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

One significant shortcoming 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 mischaracterised as static features. The assessment fails to acknowledge their continued use and meaning, as well as the

development's potential impact on their setting. This oversight results in an inadequate evaluation of cultural effects and disregards their importance within community life.

Additionally, the application neglects the intangible aspects of cultural heritage, which include the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These factors are vital to the area's identity but are entirely omitted from the assessment, creating a significant gap. Without considering these elements, the cultural impact of the development cannot be adequately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity and recognised characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the validity of the assessment and fails to align with established principles of participation concerning decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the shortcomings in evaluating living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application lacks a sound basis for determining the true cultural costs associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report remains unpublished. This lack of transparency represents a significant evidential gap, hindering both public understanding and the competent authority’s ability to evaluate the social risks identified through the developer's own research.

Available summaries suggest that residents are currently dealing with measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, based on direct engagement, are not speculative, yet the failure to disclose the complete assessment hampers proper scrutiny of these findings and restricts the assessment of their significance in the decision-making process.

Furthermore, evidence indicates that the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” found in the developer’s own findings. Despite this recognition, these impacts have not been adequately integrated into the main application or afforded appropriate weight. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development, undermining the Environmental Impact Assessment process.

A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at stake. By not supplying the complete dataset, the application does not present a comprehensive evidential basis for assessing the balance between benefits and harms.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence at hand indicates existing adverse effects that have not been fully disclosed. Without the full assessment, it cannot be established that compliance with this policy has been achieved.

The procedural implications are notable, as the competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

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's assessment of construction and pollution risks is fundamentally lacking and fails to provide the necessary detail for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on mitigation and contingency measures that would be developed

after consent, which limits any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises particular concerns in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies for these risks.

Further uncertainty surrounds 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, which have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This situation introduces procedural risks and diminishes the ability of the competent authority to assess the effectiveness of environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Assessment of likely significant effects and mitigation measures must occur prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The application fails to adequately assess the impacts on fisheries and marine life, lacking a strong evaluation of both ecological and socio-economic consequences. The coastal waters off West Lewis are home to a vibrant marine ecosystem and a thriving fishing industry. However, the proposal does not show how these habitats and uses can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be moved without

repercussions. The application does not provide any evidence that alternative fishing grounds are available or capable of supporting the increased pressure. This is a critical gap, as such displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to underwater noise generated during construction. Extended high-energy hammer piling may disturb species over large distances, affecting dolphins among others. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application minimizes these effects without sufficient evidence.

There is a notable inconsistency in the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet impacts are described as negligible. This contradiction raises questions about the reliability of the assessment and compliance with the Habitats Regulations, especially regarding anticipated harm that may require legal authorization.

Moreover, the application does not take into account cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough 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 prove compliance with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that this proposal constitutes sustainable development.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the inconsistencies within the application contribute to an incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking, failing to consider the full scope of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. Excavation will occur in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically delicate habitat. As a result, the application does not provide a thorough assessment of these impacts,

hindering a complete understanding of the project's overall environmental footprint.

The failure to assess the onshore impacts, whether by exclusion or deferral, inhibits proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively. However, the division of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and communities remain inadequately understood.

Furthermore, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not demonstrate a thorough evaluation of impacts on these habitats or the application of appropriate avoidance measures, thus revealing a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or show that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising concerns over both deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is fundamentally flawed due to the total absence of any evaluation concerning 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 as it relates to astro-tourism. The proposal seeks to install permanent red aviation lighting that will be visible from great distances, creating a disruptive "wall of light" across the western horizon and altering the night-time environment considerably.

There has been no consideration of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of

assessment is critical, given the significance of dark skies to the area's identity and its potential to attract tourism. The failure to address these implications results in a substantial gap in the overall landscape and environmental evaluation.

Moreover, the application neglects to evaluate the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly affected by artificial lighting due to their phototactic behaviour, leading to disorientation and a heightened risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, thereby failing to investigate how the proposed aviation lighting might impact these species or contribute to increased mortality rates.

This issue is exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal behaviours or associated dangers. Species like Kittiwakes, which may engage in foraging or migration at night, are also at risk of disorientation from artificial light, yet this has not been evaluated. The absence of night-time data specific to the site creates a crucial gap in understanding the potential ecological impacts.

In the absence of a thorough assessment of nocturnal effects, it is impossible to ascertain whether there would be adverse consequences for protected species or designated sites. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is an essential aspect of the ecosystem.

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting 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 reflects a significant failure to meet the criteria of sustainable development in relation to statutory duties, national policy, and evidential standards. This application revisits the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal, however, is submitted under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

Critical deficiencies exist in the evidential basis for the application, which fails to provide complete and reliable data. Significant gaps in baseline information, reliance on a vague design envelope, unspecified mitigation measures, and the exclusion of important impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—undermine the assessment. The

Environmental Impact Assessment is therefore insufficient, rendering it impossible to fully understand the likely significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations set forth in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment constitutes a significant oversight. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for assessment.

The proposal stands in direct opposition to the National Planning Framework 4. It fails to provide evidence of biodiversity protection, safeguarding of natural places, and preservation of cultural heritage. There is no demonstration that the health and wellbeing impacts are acceptable, nor is there evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately examined, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty and potential significance surrounding environmental risks. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering the ability to lawfully conclude that impacts are acceptable.

Additionally, the proposal will lead to considerable 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 connections, and adverse effects on tourism represent permanent changes that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or activate the relevant regulatory mechanisms to require the submission of the missing data.

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

Additional Comments

I object as I believe this construction will negatively impact all of the above

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: 58F0F9A8

Member of the public 1899

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection stems from an analysis of the Environmental Impact Assessment Report and associated documents, which reveal significant deficiencies in planning, environmental considerations, cultural respect, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the project, specifically questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. There are notable gaps in critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, several key aspects of the proposal remain undefined. The reliance on a flexible design framework hinders a clear understanding of the likely significant effects, while the unspecified mitigation measures make it impossible to assess their effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by adequate evidence.

Furthermore, there are pronounced policy conflicts associated with the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal in this area raises serious concerns about landscape capacity, visual dominance, and environmental impact, given the large turbines planned to be positioned close to the shoreline. The cumulative effect of insufficient information, reliance on undefined mitigation, evidential deficiencies, and clear non-compliance with policy illustrates that the application is incomplete and cannot facilitate a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

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 application fails to provide an adequate assessment of alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, it presents a narrative of project evolution that

does not effectively demonstrate that less harmful options have been properly identified and assessed in favour of solutions that may be more damaging.

A clear lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations is evident. Notably, the application does not show that the developer has thoroughly considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, this omission means that it cannot be established that the proposed siting is the least damaging option.

The inadequacies are further seen in the cable routing and landfall assessment, where there is little evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been utilised, relying instead on post-design measures.

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

From a policy standpoint, these deficiencies raise significant concerns regarding compliance with National Planning Framework 4, especially in terms of protecting natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a substantial omission that reinforces the conclusion that the application has not undergone sufficient evaluation and cannot justify a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species presents significant deficiencies, lacking a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is noted for its sensitivity and biological activity, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

A notable gap is the inadequate consideration of otters, a species protected under European law. The application does not appropriately recognise or assess their active utilisation of coastal regions for foraging and movement. This oversight concerning their core foraging range and behavioural patterns results in an insufficient evaluation of the

potential effects from construction disturbances, noise, and increased activity. Such shortcomings call into question the conclusions drawn regarding the lack of significant effects on this species.

Further issues arise with the assessment of basking sharks, where reliance on aerial surveys creates a considerable detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, particularly in light of established land-based observations that indicate these waters are frequently used. The failure to integrate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological flaws in the assessment result in conclusions regarding negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty surrounding the true extent of risk to marine species and habitats is concerning.

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 does not properly identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby 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 results in an assessment that is fundamentally unreliable. These shortcomings impede a rigorous evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is located 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. The ornithological assessment accompanying the application is significantly flawed, revealing considerable gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate that these species will not be adversely affected, as required by the evidential standard.

A fundamental contradiction is present in the application, where the developer concludes that no significant adverse effects will occur while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and highlights that its conclusions are not backed by the underlying evidence. The assessment lacks sufficient evidence regarding the impact on

seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, and does not adequately consider the importance of these feeding grounds. The reliance on modelling approaches leads to uncertainty, especially for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and behavioural responses are not thoroughly understood.

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

From a regulatory perspective, 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, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, 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 places the proposal in direct conflict with national policy.

Overall, the assessment is rendered unreliable due to internal inconsistency, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is significantly deficient and overlooks the West Lewis coastline's status as a dynamic cultural landscape, where the environment, language, tradition, and community are interconnected. The application employs a simplistic approach that treats heritage as discrete, unchanging assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice; however, the assessment categorises them merely as static elements, failing to acknowledge their continued use and significance, as well as the potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their vital role in community life.

Moreover, the application does not account for intangible cultural heritage aspects,

including the Gaelic language and local traditions, as well as the enduring relationship between the community and its coastal environment. These components are essential to the region's identity yet are conspicuously absent from the assessment, representing a critical oversight. Without addressing these elements, the true cultural impact of the development remains poorly understood.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. The lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

Additionally, a significant procedural error is the omission of a compliant Island Communities Impact Assessment, which is a statutory obligation under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This gap alone renders the determination of the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct violation of National Planning Framework 4, particularly regarding the protection of historic assets and sites. The failure to take into account both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from policy mandates.

In summary, the lack of assessment concerning living heritage, intangible cultural values, community rights, and statutory requirements results in a substantial evidential gap. The cultural ramifications of the development have not been adequately appraised, and the application fails to present a sufficient basis for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of transparency results in a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer’s own research. Available summaries highlight that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement, indicating that they are based on lived experiences rather than speculation. Yet, without access to the complete assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

There is also documented evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own research. Nonetheless, these concerns have not been adequately

integrated into the main application or given appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, which further undermines the Environmental Impact Assessment process.

A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when the character and functioning of the community may be at risk. The application does not provide the full dataset needed to accurately assess the balance between benefits and harm, failing to meet the evidential standards required.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, existing evidence points to adverse effects that have not been disclosed in full. Without access to the entire assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse effects, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination, reinforcing the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking and does not adequately account for the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to accurately convey the magnitude of the visual change that would ensue. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the intrinsic qualities of naturalness and remoteness. There is a notable shortcoming in how this impact is presented, failing to reflect its significance within such a sensitive landscape.

There are also serious methodological issues concerning the chosen visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most

sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact may have been understated, compromising the reliability of the assessment.

Additionally, the assessment does not adequately consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of impacts on their context and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This results in not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural landscapes and historic assets. The level of change proposed is inconsistent with the imperative to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy guidelines.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and important habitats, which are particularly vulnerable to contamination and sediment disturbance. The proposal includes significant seabed preparation and installation activities within a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns given the

sensitivity of the surrounding environment. While the application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide enough detail on how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential consequences for marine species and habitats that have already been identified as sensitive.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information prevents a lawful determination. The application also does not adequately demonstrate compliance with the policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

Moreover, the proposal poses significant risks to marine species, particularly due to the

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

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

Furthermore, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does

not demonstrate a thorough assessment of potential impacts on these habitats or indicate that adequate avoidance measures have been considered, creating a notable evidential gap concerning biodiversity protection.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed development introduces permanent red aviation lighting that will create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. This lighting has not been assessed for its impact on visual amenity, landscape character, or the experiences of residents and visitors, despite the critical importance of dark skies for the region's identity and the growth of sectors like astro-tourism.

There is a particularly concerning absence of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not include a lighting impact assessment or a phototaxis study to understand how the proposed aviation lighting may affect these species and potentially increase mortality rates. Furthermore, the ornithological assessment relies solely on daytime survey data, neglecting nocturnal activity and the associated risks, leaving vulnerable species such as Kittiwakes, which may forage or migrate at night, unassessed for their risks from artificial lighting.

The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts. Without this assessment, it is impossible to determine whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not

met, which invokes the precautionary principle and prevents a lawful determination of the application.

Moreover, from a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. This oversight also undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem.

In summary, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The application is incomplete, lacking essential baseline data, impact modelling, and species-specific analysis, making it incapable of supporting a lawful determination.

TOURISM

The application significantly underrepresents the potential impacts on tourism, a crucial sector for the Isle of Lewis economy. This area's tourism thrives on its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. With 86% of visitors attracted by the scenery, the proposal does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has shown remarkable growth, with its contribution rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and the deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the region. Without such crucial analysis, it remains unclear if the proposed development would result in a net economic benefit or if it would jeopardise an already thriving sector.

Furthermore, the evaluation fails to account for the critical role that environmental quality plays in tourism, particularly regarding unspoiled landscapes and dark skies which are vital for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the effects on a recognised and growing segment of the local economy.

Considering the limited economic diversification within this island community, the oversight in assessing tourism impacts has broader implications for employment, local enterprises, and community sustainability. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately examined, as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism

as a growth sector and does not furnish enough evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the economic dependency of the island culminates in a significant evidential gap. This deficiency hinders a comprehensive evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This proposal mirrors the core issues of the 2008 Lewis Wind Power application, where the level of industrialisation was deemed unacceptable. Notably, it is now being advanced under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical examination reveals that the application does not present a comprehensive or reliable evidential basis for evaluation. There are significant gaps in baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures further complicates the assessment. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As such, the Environmental Impact Assessment is incomplete, failing to provide clarity on likely significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

Moreover, the proposal contravenes National Planning Framework 4. It does not adequately safeguard biodiversity, natural places, and cultural heritage. The evidence provided does not support that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion on the acceptability of impacts.

Additionally, the proposal would bring about substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption to cultural and visual relationships, and negative effects on tourism represent permanent changes that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either reject this application on these grounds or invoke the relevant regulatory provisions to compel the submission of the missing information.

Consequently, a formal request is submitted 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: 5F500A29

Member of the public 1900

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It stems from a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural elements. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched natural environment, and rich cultural identity. The dimensions, proximity, and design of this project raise serious questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and critical components of the proposal remain unspecified. The employment of a flexible design framework obscures an understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by solid evidence.

There are evident and substantial conflicts with policy. The proposal appears to contravene 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 adequately demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the competent authority's capacity to ascertain the development's acceptability in policy terms.

The proposal's scale is unprecedented for this location, with large turbines sited near the shoreline, provoking substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, 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 circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal for the development is underpinned by an Environmental Impact Assessment Report that is fundamentally flawed, failing to deliver a full, transparent, or reliable account of the potential environmental impacts. The introduction of a flexible Project Design Envelope, which lacks defined turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This ambiguity hampers the ability to apply a consistent worst-case scenario, thereby compromising the integrity of the assessment and obscuring the true environmental effects. Consequently, both the public and the competent authority are left without a clear understanding of the possible impacts from the development ultimately constructed.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the basis that environmental harm will be mitigated later undermines the potential for a meaningful evaluation of effectiveness and leaves residual impacts unassessed. This deferment of essential information to post-consent phases is procedurally improper and contradicts the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to any determination.

There are substantial evidential shortcomings within the assessment, including gaps in baseline data and methodological limitations. The reliance on assumptions rather than site-specific evidence leads to uncertainty regarding the extent and significance of impacts. This is particularly concerning when conclusions regarding negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information inhibits a thorough understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially in relation to protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of the environmental effects, leaving the competent authority unable to make an informed determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application presents a significant inadequacy in the assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment

regime. It offers a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method does not demonstrate that less harmful options have been adequately identified, assessed, and selected in favour of more damaging solutions.

A transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations is notably absent. Specifically, the application does not establish that the developer has seriously contemplated placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies further extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. 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 inadequacy undermines compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is inadequate, resulting in a lack of a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the methodologies used fall short of capturing essential data on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One critical gap in the assessment is the treatment of otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of how construction

disturbances, noise, and increased activity might affect them. Thus, the assessment's conclusions regarding the absence of significant effects on otters are fundamentally flawed.

The assessment also inadequately addresses basking sharks, relying heavily on aerial surveys which introduce considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to include or give proper consideration to this data results in an incomplete baseline, undermining the reliability of the conclusions reached.

These methodological shortcomings mean that the claims of negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of sufficient baseline data hampers any meaningful evaluation of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions, leaving considerable uncertainty regarding the actual risks 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 the identification and assessment of protected species have not been conducted appropriately. This uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, the granting of consent is not legally justifiable.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the notion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a significant concern regarding its ability to meet the evidential threshold necessary for concluding that there will be no adverse effect on the integrity of protected sites. The ornithological assessment contains considerable gaps in evidence, coupled with internal contradictions that undermine its reliability. Notably, the assessment fails to robustly evaluate the implications associated with displacement, collision risk, and habitat loss for seabird populations in key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is known to support internationally important seabird species, many of which are already in decline.

A critical inconsistency is evident in the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessitated when significant harm is anticipated. This contradiction raises serious doubts regarding the validity of the assessment and highlights that the conclusions drawn are not underpinned by sufficient evidence.

Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to fully account for the importance of these feeding grounds, and its reliance on modelling approaches introduces an element of uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor presents an additional risk, as it effectively creates a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application neglects to adequately assess the long-term consequences of sustained mortality in this corridor and the potential ramifications for species with relatively small global populations.

The cumulative effect of these deficiencies signifies a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places this proposal in direct opposition to national policy.

Overall, the assessment is marred by methodological weaknesses, insufficient evidence, and internal inconsistency, which collectively hinder a robust evaluation of impacts. These shortcomings lead to the conclusion that the application does not satisfy the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application does not adequately assess cultural heritage and community identity, particularly along the West Lewis coastline. This area is a living cultural landscape, where the environment, language, tradition, and community are interconnected. Instead of recognising these relationships, the application treats heritage as isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual practice, yet the assessment categorises them as static features, overlooking their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the role these sites play in community life.

Furthermore, the application neglects to assess intangible cultural heritage elements, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but are completely missing from the assessment, constituting a significant omission. Without addressing these factors, the cultural impact of the development

cannot be fully understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds 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 validity of the assessment and fails to adhere to established principles for participation in matters affecting cultural and environmental interests.

A critical procedural error is the omission of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone hampers lawful determination.

From a policy standpoint, the deficiencies in the application conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the lack of recognition of living cultural practices indicate a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding social impacts, health, and wellbeing, which remain inadequately assessed and lack the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the comprehensive report has not been made publicly available. This lack of access constitutes a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own research.

Reports suggest that local residents are currently facing measurable stress, anxiety, and apprehension due to the scale and proximity of the development proposal. These negative impacts stem from direct engagement with the community and are not mere speculation. Nonetheless, the absence of the full assessment obstructs proper examination of these findings and restricts the capacity to gauge their importance in the decision-making process.

Furthermore, there is evidence indicating that the proposed development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Unfortunately, these identified impacts have not been

adequately incorporated into the main application nor afforded appropriate consideration. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be at stake. By failing to provide the complete dataset, the application does not present a comprehensive evidential foundation needed for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 concerning health and wellbeing. Developments are mandated to promote positive health outcomes and avert harm, yet the information presently available indicates existing negative effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications arising from this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material deficiency within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped landscape, offering a strong sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a dominant industrial presence that would permanently alter this unique character. The assessment of visual impacts fails to accurately convey the extent of this change. The turbines would significantly affect views from residential areas, historic sites, and popular coastal locations, leading to a loss of visual amenity and diminishing the qualities of naturalness and remoteness.

There are significant concerns about how visual viewpoints were selected and presented. Some viewpoints may not adequately represent the most sensitive areas or worst-case scenarios, especially concerning cultural heritage sites and valuable landscapes. This could lead to an understatement of the visual impact, raising doubts about the assessment's reliability.

Moreover, the assessment does not take into account 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

linked visually and spatially to the Atlantic horizon. By treating these sites as isolated, the assessment fails to consider their interdependent relationships, resulting in an incomplete evaluation of their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and their relationship with the natural horizon. This change represents a visual and broader cultural impact that has not been properly addressed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The proposed changes are incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a solid worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and location of the turbines, their visual dominance would be unavoidable. Consequently, the change to the landscape would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and strengthen the argument that the proposal is not compatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans raises significant concerns regarding the proposal's adherence to environmental protection standards. The project entails extensive seabed preparation and installation in a challenging high-energy Atlantic environment, yet relies on unspecified mitigation and contingency measures that are to be developed after consent. This approach fundamentally undermines any meaningful evaluation of the potential adequacy and effectiveness of these measures.

Particularly troubling is the sensitivity of the receiving environment, which includes the West Lewis coastline characterised by clean coastal waters and important habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, managed, or monitored effectively.

Moreover, there exists a notable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of such impacts. This uncertainty further extends to the possible effects on marine species and habitats that

are already recognised as sensitive in the broader assessment context.

The situation is exacerbated by the lack of detailed emergency response procedures. Deferring contingency planning until post-consent prevents a thorough evaluation of whether adequate safeguards are in place to manage pollution incidents effectively. This introduces procedural risks and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in implementing essential environmental safeguards is inconsistent with the mandates of the Environmental Impact Assessment framework. It is imperative that significant effects and mitigation strategies are evaluated prior to granting consent; without such information, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

Collectively, the failure to articulate defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of 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 fails to provide a thorough assessment of the onshore infrastructure, which is essential for understanding the full impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated independently, leading to a disjointed approach that obscures the real scale of environmental and socio-economic consequences.

Key onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, poses a threat to this significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment means the project's overall environmental footprint cannot be fully understood.

By deferring the evaluation of onshore impacts, the application hampers the proper analysis of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project components, yet the fragmented assessment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, sensitive habitats, such as machair systems and peatland environments, are at risk and are afforded policy protection. The application does not convincingly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, highlighting a significant

evidential gap in biodiversity protection.

Concerns regarding carbon balance also arise. Disturbing peatland releases stored carbon, potentially generating a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this concern or fails to show that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. The application does not provide evidence that necessary consents or processes have been initiated, which raises doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project as a cohesive whole and to demonstrate the protection of peatlands, habitats, and land use interests conflicts 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 disjunction of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of nocturnal wildlife and dark skies constitutes a serious flaw in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that will be visible over vast distances, resulting in a persistent and intrusive "wall of light" that would drastically transform the night-time landscape.

The application fails to evaluate 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 the region's identity and the growth of tourism sectors like astro-tourism. The neglect of these impacts highlights a substantial shortcoming in the overall assessment of landscape and environmental effects.

Moreover, there is no analysis of the consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly affected by artificial lighting due to their phototactic nature, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to investigate how aviation lighting might harm these species or raise mortality rates.

The situation is worsened by the use of daytime survey data in the ornithological

assessment, which overlooks nocturnal activities and their associated dangers. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without an evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The necessary evidential standard to rule out negative impacts beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions are inconsistent with the National Planning Framework 4 concerning the safeguarding of natural areas and environmental quality. Furthermore, this neglect undermines the comprehensive evaluation of landscape and seascape effects, as the character of night-time environments is a crucial component of the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife represents a significant evidential void. The absence of baseline data, impact modelling, and species-specific examination makes the application incomplete and incapable of achieving a lawful determination.

TOURISM

The assessment of tourism impacts related to the application is grossly inadequate, neglecting to analyse the economic and social repercussions for a critical sector of the Isle of Lewis economy. With 86% of visitors attracted by the area's scenery, which includes its wild coastline, nearly untouched landscapes, dark skies, and remoteness, the lack of a thorough evaluation of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions is alarming.

Tourism has shown remarkable growth, rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island’s economy. Nevertheless, the application fails to model the potential effects of industrialising the seascape and the resulting decline in environmental quality on Tourism Gross Value Added or the broader economic resilience. This absence of analysis precludes any determination of whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment disregards the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this deficiency, creating a critical gap in understanding impacts on an increasingly recognised part of 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 lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unassessed, as required under the Islands (Scotland) Act 2018.

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

Collectively, the failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the island's economic dependencies results in a significant evidential gap. This lack of thorough assessment hampers a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development 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: ED30BB0B

Member of the public 1901

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

Dear Sir/Madam

This representation 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 supporting documentation reveals significant material deficiencies in planning, environmental consideration, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide an adequate evidential basis for lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the development's acceptability within policy parameters.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not deliver a full, transparent, or dependable account of the potential environmental effects associated with the proposal. The flexible Project Design Envelope employed in the application, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, hindering both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Furthermore, the application is predominantly dependent on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any substantial evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Additionally, there are significant evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, especially in cases where negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or appropriate safeguards implemented.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to offer an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet

the baseline data provided is insufficient. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species, compromising the assessment's ability to evaluate potential impacts reliably.

A significant shortcoming is the treatment of otters, classified as a European Protected Species. The application neglects to fully acknowledge and assess their active usage of coastal regions for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, means that the possible effects of construction disturbances, such as noise and increased human activity, have not been adequately evaluated. Consequently, the conclusions drawn about the absence of significant effects on otters are undermined.

Moreover, the assessment of basking sharks is flawed, with reliance on aerial surveys leading to considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that suggest frequent usage of these waters. The failure to integrate or properly consider this data results in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hampers the ability to assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment framework or National Planning Framework 4, as it has not adequately identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects with reasonable scientific certainty, thereby invoking the precautionary principle. Under these circumstances, granting consent is not legally permissible.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, thereby revealing that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the development application is materially flawed, containing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The application has not demonstrated to the required evidential standard that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. The implications of displacement, collision risk, and habitat loss have not been robustly

evaluated.

There exists a fundamental contradiction within the application, as the developer concludes that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This derogation is only necessary when significant harm is expected, raising questions about the reliability of the assessment and indicating that the conclusions are unsupported by the underlying evidence. The application fails to provide sufficient evidence 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 accounted for, and the use of modelling approaches introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. Methodologies applied are likely to underestimate mortality, especially where baseline data is incomplete and behavioural responses are not fully understood.

Moreover, the siting of turbines within a recognised migratory corridor introduces an additional risk by creating a barrier along a primary flight path used by 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 that have relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing a lawful conclusion that would support consent.

The deficiencies identified 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 conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, preventing a robust evaluation of impacts and contributing to the conclusion that the application does not meet the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer has engaged local residents through focus groups, the absence of the complete report represents a significant evidential gap. This gap restricts both public understanding and the competent authority's ability to fully grasp the social risks highlighted in the developer's own research.

Evidence shows that residents are currently facing measurable levels of stress, anxiety,

and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are thus factual, not speculative. The lack of transparency in sharing the full assessment hinders proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Moreover, there is a perception among residents that the proposal threatens community identity and cohesion, with indications of “cultural loss” noted in the developer’s findings. Yet, these social impacts have not been adequately integrated into the application or given the necessary weight. Consequently, the withholding of the full assessment obscures the true human and social cost of the development.

This failure of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when they may affect community character and functioning. Without the full dataset, the application lacks a comprehensive evidential basis for weighing the balance between potential benefits and harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Consequently, it is impossible to demonstrate compliance with this policy in the absence of the full assessment.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the documented existence of adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not sufficiently account for the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines in proximity to the shore would establish a continuous and prominent industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

Furthermore, the application fails to represent the full extent of the anticipated visual changes. Given the scale and proximity of the turbines, they would dominate views from residential properties, historical sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and diminish the qualities of naturalness and remoteness that currently define the area. The assessment does not adequately communicate the level of impact or its significance within the context of such a sensitive landscape.

There are also significant methodological issues regarding the selection and depiction of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This inadequacy poses a risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, a critical shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to a broader landscape context, visually and spatially connected to the Atlantic horizon. The assessment treats these significant assets in isolation, disregarding their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and affecting their relationship with the natural horizon. This represents not only a visual impact but also a wider cultural and spatial detriment that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 concerning the protection of natural environments and historical assets. The extent of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further challenges any assertion of policy conformity.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Thus, the resulting change is fundamentally significant 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 the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and affirm the conclusion that the proposal is incompatible with the preservation 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 assessment concerning fisheries and marine life is inadequate, lacking a thorough evaluation of ecological and socio-economic repercussions. The coastal waters off West Lewis host a diverse marine ecosystem alongside an active fishing industry.

However, the application fails to demonstrate how these vital habitats and activities can be preserved without significant disruption.

A critical concern lies in the assumption that fishing activities can be relocated without negative consequences. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can accommodate the additional pressures that may arise. This oversight is particularly important, as displacing fishing efforts could lead to overfishing in other areas, which may result in broader economic ramifications for the local fishing fleet. In the absence of a well-supported and clear assessment, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, especially from the underwater noise generated during construction activities. High-energy hammer piling over extended periods is expected to create disturbances across considerable distances, which could affect species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming concerns; yet, the application diminishes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction undermines the reliability of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Furthermore, the assessment fails to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a detailed examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application does not show compliance with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, hindering any assertion that the proposal constitutes sustainable development.

Considering these points collectively, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment flawed and unreliable. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The examination of onshore infrastructure is significantly lacking and does not adequately account for the comprehensive impacts stemming from what constitutes a singular, integrated project. The connection between offshore turbines and onshore works is critical, yet these elements are evaluated in isolation. This fragmented assessment clouds the true magnitude of the environmental and socio-economic ramifications.

Onshore activities encompass cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through delicate landscapes. These undertakings necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is not only a vital carbon sink but also an ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The omission or postponement of onshore impact evaluations obstructs an accurate appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered in conjunction. However, the distinct treatment of offshore and onshore components obscures the collective impacts on peatlands, habitats, and local communities, leaving these critical aspects inadequately understood.

Moreover, there are significant threats to vulnerable habitats, such as machair systems and peatland environments, which hold policy protection. The application does not convincingly demonstrate that the consequences for these habitats have been thoroughly evaluated or that suitable avoidance strategies have been enacted. This results in a notable evidential void concerning biodiversity preservation.

Concerns regarding carbon balance are also prominent. Disturbance of peatland results in the release of stored carbon, which may instigate a carbon debt, undermining the very objectives of renewable energy initiatives. The application lacks sufficient analysis of this matter or fails to show that the overall carbon balance is favourable.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with current land use and legal rights. There is no evidence provided that the requisite consents or procedures have been initiated, leading to doubts about the feasibility and lawful execution of the proposal.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate safeguarding of peatlands, habitats, and land use concerns is at odds with the National Marine Plan and National Planning Framework 4. The inability to prove that adverse impacts can be avoided or mitigated further diminishes the application's credibility.

Ultimately, the disjointed treatment of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts

render this portion of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This significant alteration of the night-time environment threatens the exceptionally dark skies of the West Lewis coastline, which are essential to the area's environmental quality, cultural identity, and tourism value. The application fails to assess the impacts of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the crucial role dark skies play in the region's identity and in emerging sectors such as astro-tourism.

Moreover, there is a complete lack of evaluation regarding the impact on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and elevate collision risks. The absence of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting may affect these species or contribute to increased mortality rates. This gap is further compounded by the reliance on daytime survey data in the ornithological assessment, which neglects to capture nocturnal activity or the associated risks. Vulnerable species, such as Kittiwakes, which forage or migrate at night, remain unassessed in terms of their risk of disorientation from artificial lighting.

Without a comprehensive assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The failure to meet the evidential standard required to exclude adverse effects beyond reasonable scientific doubt invokes the precautionary principle, thereby precluding a lawful determination. Additionally, 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 thorough assessment of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In conclusion, the lack of assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenery; however, there is no quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic

contribution.

Tourism has experienced significant 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. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to ascertain whether the development would provide a net economic benefit or detract from an established and expanding sector.

Additionally, the assessment fails to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a considerable gap in understanding the implications for a recognised and growing aspect of the local economy.

In an island community characterised by limited economic diversification, the neglect to evaluate tourism impacts has 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 assessed as required under the Islands (Scotland) Act 2018.

From a policy perspective, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector and does not provide adequate evidence to enable the competent authority to assess the economic ramifications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental influences on visitor behaviour, and considering the island's economic dependency result in a substantial evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application revisits the core problems that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented within a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this application. It lacks comprehensive baseline data and relies on an undefined design envelope. Furthermore, it is dependent on unspecified mitigation measures and fails to address

critical impact pathways, including effects on nocturnal wildlife, the full extent of onshore infrastructure, and potential impacts on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the significant effects or residual impacts that may arise.

The application also exhibits serious procedural shortcomings. The absence of a compliant Island Communities Impact Assessment breaches the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide the complete Social Impact Assessment constitutes a notable omission. These gaps inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

The environmental risks associated with this proposal remain uncertain and could be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

The outer hebrides are a beautiful, unspoilt and diverse ecological area of our amazing nation. To sell off that unspoilt beauty and negatively effect local communities and wildlife to the highest bidder is shameful. There are many alternative options to

renewable energy available at a much lower cost to all the above mentioned objections (such as putting solar panels on buildings, car parks and shops in towns and cities, to name one option).
There is no reasonable reason to disturb natural land and seascape or natural habitats for such a scheme.
The disruption to nature both visibly and ecologically will be far beyond what would be deemed acceptable.
For the residents living there having to put up with all the challenges that come along with living by these eye sores, its not just the visible and unsightly impact it is also the impact on health due to the well documented effects they have on residents but also the loss of value on their homes and communities because of it.

The islands are not a forgotten part of our nation but a beautiful, historical and diverse area we are all proud of, i would implore you, do not spoil it for money or a flagging agenda.

Thank you kindly, leave it well alone.

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: 067C2733

Member of the public 1902

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. An analysis of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly in relation to its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is limited and inconsistent. Many key aspects of the proposal remain undefined. The reliance on a flexible design framework impedes a clear understanding of the likely significant effects, while the dependence on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are apparent and substantial conflicts with existing policies. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal presents significant challenges, with large turbines located in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. When considering the insufficiency of information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance, it becomes clear that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are glaring, rendering it materially inadequate and failing to offer a full, transparent, or reliable account of the potential environmental effects linked to the proposal. The reliance on a flexible Project Design Envelope, lacking any commitment to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, compromising the integrity of the assessment and inhibiting both the public and the competent authority from grasping the true scale of environmental impacts.

Moreover, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is sought on the premise that environmental harm will be mitigated later, which hinders any meaningful evaluation of their effectiveness or the assessment of residual impacts. This delay in providing essential information until after consent is procedurally unacceptable and undermines the fundamental aims of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Evidential deficiencies are also present, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially in cases where negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information inhibits a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that contradicts statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This scenario invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application proposes a project that suffers from significant shortcomings in its assessment of alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on environmental impacts, the

application merely outlines the evolution of the project. This narrative fails to show that less harmful options have been properly identified, evaluated, and chosen over more damaging solutions.

In particular, there is a noticeable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application does not provide adequate evidence that the developer has thoroughly considered positioning turbines further offshore, an option that could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline highlights the importance of evaluating proximity to shore in determining overall impact, and the absence of this analysis obstructs any determination that the chosen siting is the least damaging available option.

The deficiencies are also evident in the assessment of cable routing and landfall, where there is insufficient information that alternative routes have been properly investigated to avoid or reduce impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and comparative analysis suggests that there has been no application of mitigation by design, instead relying on measures implemented post-design.

Consequently, the application fails to demonstrate that environmental harm has been adequately minimised through site selection, layout, and infrastructure routing. This oversight signifies a breach of the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a thorough assessment of alternatives, it is not possible to determine if the proposal can be considered sustainable or compliant with policy.

From a policy standpoint, these deficiencies compromise adherence to the 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 ultimately leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species presents significant deficiencies, lacking a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is noted for its sensitivity and biological activity, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

A notable gap is the inadequate consideration of otters, a species protected under European law. The application does not appropriately recognise or assess their active

utilisation of coastal regions for foraging and movement. This oversight concerning their core foraging range and behavioural patterns results in an insufficient evaluation of the potential effects from construction disturbances, noise, and increased activity. Such shortcomings call into question the conclusions drawn regarding the lack of significant effects on this species.

Further issues arise with the assessment of basking sharks, where reliance on aerial surveys creates a considerable detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, particularly in light of established land-based observations that indicate these waters are frequently used. The failure to integrate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological flaws in the assessment result in conclusions regarding negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty surrounding the true extent of risk to marine species and habitats is concerning.

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 does not properly identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby 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 results in an assessment that is fundamentally unreliable. These shortcomings impede a rigorous evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

importance to community life.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The reliance on undefined future measures in the proposal raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to both sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on the methods for preventing, controlling, or monitoring these risks.

Moreover, the assessment of construction and pollution risks is notably incomplete, failing to provide the necessary details to evaluate the potential environmental effects adequately. The proposal entails substantial seabed preparation and installation works in a high-energy Atlantic environment; however, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead,

it depends on mitigation and contingency measures that are to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

There exists 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 consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have been identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This approach introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent; therefore, the absence of this information renders a lawful determination impossible. Additionally, the application fails to demonstrate adherence to policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment lacks a thorough evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem as well as a thriving fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without significant disruption.

A key concern is the assumption made regarding the displacement of fishing activities without acknowledging the potential consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of handling any additional pressure. This absence of information is critical, as displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and the livelihoods they support remain inadequately understood.

Moreover, there are substantial risks posed to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over a prolonged period is expected to disturb species over considerable distances, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

The application reveals a glaring inconsistency; it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously characterising the anticipated impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal authorisation.

Additionally, the assessment overlooks cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these interconnected effects, it is impossible to gauge 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, thus preventing any conclusion that the proposal constitutes sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration will fundamentally change the night-time environment. There is a significant omission in the Environmental Impact Assessment regarding 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. The failure to assess the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is concerning, especially as dark skies are increasingly important to emerging tourism sectors such as astro-tourism.

Moreover, the proposal lacks an evaluation of the 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 lead to

disorientation and a higher risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which leaves unaddressed how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it fails to capture nocturnal activity or the associated risks. Other species, including Kittiwakes, may forage or migrate at night and are also vulnerable to the disorienting effects of artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission conflicts with National Planning Framework 4, which concerns the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is a crucial component of the environment. Collectively, the lack of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unable to support a lawful determination.

TOURISM

The 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 Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

Moreover, the application exhibits clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural

identity, and economic resilience, rendering the application unfit for determination.

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

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

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

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

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

Additional Comments

I am very positive of the development of appropriate and locally effective renewables. I don’t think these are either. This is big selfish business not caring about their impact or effectiveness so long as they make money and ‘win’.
I think that if places require this level of power, the selfish inefficiency of which is never discussed then they should tolerate the environmental impact of the generation tool - in this case the colossal wind turbine.
The environmental impact of the installation of these turbines would be phenomenally destructive to an already fragile environment. Again big business not actually caring about their physical impact as long as the financial one works.

I strongly object to this proposed development.

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: EE1A465D

Member of the public 1903

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 pertinent marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report alongside supplementary documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west coast of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, a largely untouched environment, and a strong cultural presence. The proposal's scale, its proximity to the shore, and its design evoke serious concerns regarding adherence to statutory obligations, national policy, and sustainable development principles.

There is a lack of adequate evidence provided for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and essential components of the proposal remain unspecified. The adoption of a flexible design framework hinders a precise understanding of potential significant effects, while the dependence on unspecified mitigation strategies renders their efficacy unassessable. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, and community impacts involved, and claims suggesting negligible or non-significant effects lack solid supporting evidence.

Substantial conflicts with policy are evident. The proposal appears to diverge from the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural areas, cultural heritage, and public health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies are critical as they directly relate to the statutory tests necessary for consent and compromise the capability of the competent authority to affirm that the development aligns with policy standards.

The unprecedented scale of this proposal poses additional challenges, with large turbines situated in close proximity to the coastline, raising significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policies illustrate that the application is incomplete and cannot facilitate a lawful decision. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a comprehensive, transparent, or dependable account of the potential environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations for turbines, creates considerable uncertainty. This ambiguity obstructs a consistent assessment of worst-case scenarios, compromising the integrity of the evaluation and preventing both the public and the competent authority from fully grasping the true scale of environmental effects that may arise from the development.

Moreover, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be rectified at a later stage hinders any substantial appraisal of the effectiveness of these measures or the assessment of residual impacts. Deferring essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly identified before any determination is made.

There are also critical evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly in cases where conclusions 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 obligations.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations, which is essential 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 conform to the requirements outlined in National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to establish that impacts have been adequately assessed or that suitable 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 unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the proposal is significantly lacking, failing to offer a thorough and dependable understanding of ecological receptors in the West Lewis coastal area. This marine system is both highly sensitive and biologically active, yet the existing baseline data remains incomplete,

while the methodologies employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, the assessment does not furnish a sound evidential framework for assessing potential impacts.

One notable gap concerns otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight of their core foraging areas and behavioural patterns leads to an inadequate evaluation of the possible impacts stemming from construction activities, noise, and increased human activity. This deficiency undermines any assertions about the lack of significant effects on the otter population.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its potential impact on seabird populations, particularly given the west coast of the Isle of Lewis is home to internationally important seabird species that are already experiencing declines. The ornithological assessment submitted with the application is fundamentally flawed,

marked by significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The key foraging areas and migratory pathways that the development encroaches upon have not been adequately evaluated for implications related to displacement, collision risk, or habitat loss.

A critical contradiction is evident in the application, wherein the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is warranted only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions presented lack adequate support from the available evidence. The assessment fails to convincingly 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 insufficiently addressed, and reliance on modelling approaches introduces further uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially due to incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application fails to provide the evidence necessary to confirm that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means the standard of proving beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion in support of consent. Furthermore, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to adequately demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal contradictions, methodological weaknesses, and inadequate evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the overarching conclusion that the application does not fulfil the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to properly assess the cultural heritage and community identity associated with the West Lewis coastline, which should be recognised as a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly

simplistic, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming of the application is its 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 without considering their continued use and significance or the potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects, neglecting their integral role in community life.

Additionally, the assessment overlooks intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity and their absence from the evaluation represents a substantial omission. Without factoring in these aspects, it is impossible to gain a full understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics recognised under Indigenous People, yet the application lacks a process of Free, Prior and Informed Consent. The absence of meaningful engagement not only undermines the legitimacy of the assessment but also fails to adhere to established principles of participation concerning decisions that affect cultural and environmental interests.

Furthermore, a notable procedural failure is the lack of a compliant Island Communities Impact Assessment, as required under the Islands (Scotland) Act 2018. This absence hinders the competent authority's ability to meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, thus preventing a lawful determination of the proposal.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and places. The lack of consideration for both tangible and intangible heritage, along with a failure to recognise living cultural practices, constitutes a clear departure from policy requirements.

In summary, the insufficient assessment of 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 adequately evaluated, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The procedural implications of the current application are substantial. The absence of the full Social Impact Assessment hinders the competent authority's ability to carry out

a thorough socio-economic and health evaluation. This significant omission compromises the application's compliance with the evidential requirements set forth by the Environmental Impact Assessment regime.

Furthermore, the assessment of social impacts, health, and wellbeing is notably inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence prevents both the public and the competent authority from gaining a comprehensive understanding of the social risks highlighted by the developer's research.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts, drawn from direct engagement, are factual rather than speculative. The failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings, affecting the significance of these impacts in the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's own findings. Despite this, these impacts have not been adequately integrated into the main application or accorded the weight they warrant. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A complete understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. The application fails to provide a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development must foster positive health outcomes while avoiding harm. However, the evidence presented indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is fundamentally flawed, failing to adequately capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic view, its

undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible change in the landscape.

Moreover, the application does not sufficiently illustrate the extent of the visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in light of the area's sensitive landscape.

There are serious methodological issues concerning the choice and representation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, thereby compromising the assessment's reliability.

Another critical deficiency lies in the lack of evaluation of the interconnected relationship between seascape, landscape, and cultural heritage. Notably, the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape linked to the Atlantic horizon by visual and spatial connections. The assessment treats these assets as isolated, ignoring their interdependence and leading to an incomplete assessment of the impacts on their setting and cultural importance.

The industrialisation of the seascape would sever these vital connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This constitutes not only a visual impact but also a significant cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resultant changes are fundamental and permanent, rather than being reducible to acceptable levels 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 shortcomings preclude a reliable evaluation and strongly affirm that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is both incomplete and lacking the necessary detail to properly evaluate likely environmental effects. There is a substantial undertaking involved in seabed preparation and installation works within the challenging high-energy Atlantic environment. However, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on vague mitigation and contingency measures to be established after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer sufficient information on how these issues will be prevented, controlled, or monitored.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological effects of such impacts. This uncertainty also extends to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these concerns is the absence of detailed emergency response procedures. By deferring contingency planning until after consent has been granted, the application hampers the ability to evaluate whether adequate safeguards are in place to address pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to determination.

From a regulatory standpoint, deferring critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted; without this information, a lawful determination cannot be made. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further reinforcing the view 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.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is distinguished by its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over considerable distances, threatens to create an intrusive and continuous "wall of light" across the western horizon, fundamentally changing the night-time environment.

Moreover, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the critical role dark skies play in the identity of the region and the growing sector of astro-tourism, this lack of analysis is particularly concerning. The neglect to consider these impacts results in a distinct gap in the overall landscape and environmental assessment.

Equally alarming is the lack of any assessment regarding the impact on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting due to their phototaxis behaviour, which can cause disorientation and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, thus neglecting to examine how the proposed aviation lighting could influence 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 overlooks nocturnal activity and the associated risks. Species such as Kittiwakes, which may forage or migrate during the night, also face disorientation from artificial lighting. The lack of site-specific night-time data hinders a comprehensive understanding of the ecological impacts involved.

Without a proper evaluation of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites may experience adverse effects. The required evidential standard necessary to exclude potential adverse impacts beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 in its commitment to safeguarding natural spaces and maintaining environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape effects, given that night-time character is an essential aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife results in a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate a lawful determination.

TOURISM

The economic impact assessment related to tourism is severely inadequate and does not address the consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contributions from tourism.

Since 2017, tourism has seen substantial growth, rising from £65 million to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not consider how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from an already established and expanding sector.

The assessment neglects to recognise the significance of environmental quality in bolstering tourism, particularly the value 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 exacerbates this shortcoming, resulting in a considerable gap in understanding the potential impacts on an acknowledged and growing segment of the local economy.

In an island community characterised by limited economic diversification, the oversight in evaluating tourism impacts has broader implications for employment, local enterprises, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, as mandated by the Islands (Scotland) Act 2018.

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

All these factors combined—the failure to quantify tourism impacts, the oversight of environmental influences on visitor behaviour, and the disregard for the island's economic dependencies—culminate in a significant evidential gap. This inhibits 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 significant deficiencies that undermine its compliance with sustainable development requirements as mandated by statutory duties and national policy. It echoes the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of

industrialisation was deemed unacceptable. Presently, this application is set against a more rigorous policy framework that emphasises the importance of biodiversity, the protection of peatlands, the integrity of landscapes, and the wellbeing of communities.

A critical examination reveals that the proposal lacks a complete and reliable evidential foundation necessary for determination. Notable gaps exist in baseline data, with the application relying on an undefined design envelope and unspecified mitigation measures. Additionally, crucial impact pathways have been overlooked, including effects on nocturnal wildlife, the full spectrum of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment fails to adequately address likely significant effects or residual impacts.

Moreover, the application demonstrates procedural shortcomings. The absence of a compliant Island Communities Impact Assessment signifies a breach of statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment results in a material omission. These shortcomings inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, nor does it substantiate acceptable impacts on health and wellbeing. Furthermore, the absence of tourism impact modelling fails to demonstrate a net economic benefit. The cumulative effects of offshore and onshore components have not been thoroughly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and hindering a lawful determination of acceptable impacts.

Additionally, 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, disruptions to cultural and visual relationships, and repercussions for tourism would result in permanent impacts that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The array of information deficiencies, alongside policy inconsistencies and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or exercise the relevant regulatory provisions to mandate 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: 6D669A83

Member of the public 1904

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report alongside other supporting documents, revealing significant deficiencies relating to planning, environmental aspects, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with existing statutory requirements, national policies, and the tenets of sustainable development.

The application does not furnish an adequate evidential basis necessary for a lawful determination. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent, with several key elements of the proposal remaining undefined. The application's use of a flexible design framework obfuscates the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects due to a lack of robust supporting evidence.

There exist clear and significant conflicts with policy. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that the national requirements for safeguarding biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly challenge the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines situated in close proximity to the shoreline, which raises substantial concerns regarding the landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in several critical areas, resulting in an unreliable account of the potential environmental effects of the proposal. There is a significant lack of commitment to specific turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope. This uncertainty undermines the integrity of the assessment, making it difficult for both the public and the competent authority to fully understand the environmental impacts that may arise from the development.

The application depends on various mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent based on the promise of addressing environmental harm at a later stage hinders any meaningful evaluation of effectiveness or the assessment of residual impacts. This deferral to post-consent stages is unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires significant effects and mitigation to be established prior to decision-making.

Moreover, there are notable evidential deficiencies, including gaps in baseline data and limitations in the methodology. The reliance on assumptions instead of site-specific evidence creates uncertainty about the scale and significance of the impacts. This is particularly concerning where conclusions of negligible or non-significant effects are claimed without robust supporting data. The lack of sufficient information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, which includes provisions for biodiversity protection and environmental integrity, as it is unclear whether impacts have been fully assessed or if adequate safeguards are established.

Overall, the combination of an undefined design envelope, unspecified 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 the environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed project exhibits significant shortcomings in its assessment of alternatives, failing to meet the statutory requirements laid out by the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the evolution of the project. This narrative approach does not adequately demonstrate that less harmful options have been properly identified, evaluated, and selected over more damaging solutions.

There is a clear lack of transparency and evidence in the comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has given serious consideration to placing turbines further offshore, which could potentially mitigate 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 absence of such analysis prevents a conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis demonstrate that mitigation through design has not been employed, leading to a reliance on post-design measures to address impacts.

Consequently, the application does not prove that environmental harm has been adequately minimised through the choices made regarding site selection, layout, and infrastructure routing. This oversight constitutes a deviation from the established mitigation hierarchy and inhibits the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies call into question the application's alignment with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that underpins the overall conclusion that the application has not been sufficiently evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the data collected is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat utilisation of the species involved. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

One major oversight concerns otters, which are classified as a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. The lack of analysis surrounding their core foraging range and behavioural patterns means the potential effects of construction-related disturbances, noise, and increased activities have not been adequately

evaluated. This oversight undermines any claims regarding the lack of significant effects on this species.

In addition to the issues with otters, the assessment of basking sharks reveals further deficiencies. The reliance on aerial surveys introduces a significant detection bias, especially in the conditions commonly found in the Atlantic. This approach likely leads to an underestimation of their presence, particularly when compared to established land-based observations that indicate these waters are frequently used by basking sharks. The failure to incorporate or properly consider relevant data results in an incomplete baseline and detracts from the reliability of the conclusions drawn.

These methodological flaws mean that the assessment's conclusions about negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

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

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, revealing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. Situated on the west coast of the Isle of Lewis, an area known for its internationally important seabird populations, the proposed development fails to adequately demonstrate that these species, many of which are already in decline, will not face adverse effects. Critical foraging areas and migratory pathways are located within the development site, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss.

There exists a glaring contradiction in the application. While the developer asserts there will be no significant adverse effects, they simultaneously put forth a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious concerns about the assessment's reliability, suggesting that the conclusions drawn are unsupported by the evidence provided. Furthermore, there is a lack of sufficient evidence to conclude that seabirds

associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the critical importance of these feeding grounds, and the reliance on modelling methods creates uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. Methodological shortcomings may lead to an underestimation of mortality, especially in areas where baseline data is lacking and where the behavioural responses of species are not comprehensively understood.

The placement of turbines within a recognised migratory corridor introduces a substantial risk, acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of sustained mortality in this corridor and the potential impacts on species that possess relatively small global populations. From a regulatory standpoint, the application does not meet the evidential standards necessary to affirm no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means the standard of being beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, preventing a lawful conclusion that supports consent.

Moreover, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and lack of robust evidence. As a result, it ultimately fails to meet the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately recognise the West Lewis coastline as a dynamic cultural landscape, interlinking environment, language, tradition, and community. It adopts a reductive stance, viewing heritage merely as static assets while neglecting their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is found in the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual practice, yet they are mischaracterised as static features. This oversight fails to acknowledge their continuing use and meaning, resulting in an incomplete understanding of cultural effects and disregarding their importance within community life.

Furthermore, the assessment neglects intangible cultural heritage, such as the Gaelic language and local traditions, along with the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity but have been omitted from the evaluation, creating a substantial gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as possessing a unique cultural identity similar to Indigenous Peoples, has not been engaged in a Free, Prior and Informed Consent process. The lack of meaningful engagement undermines the assessment's credibility and fails to adhere to principles of participation that should guide decisions impacting cultural and environmental interests.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, which alone renders a lawful determination impossible.

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

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory requirements creates a significant evidential gap. The cultural ramifications of the development have not been sufficiently evaluated, and the application does not establish a robust foundation for understanding the true cultural cost of the proposal.

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 proposed development involves the installation of large-scale turbines close to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The introduction of such industrial structures would create a continuous presence that fundamentally changes the landscape, leading to a permanent and irreversible transformation.

The application does not sufficiently represent the extent of the visual change associated with this proposal. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic sites, and popular coastal locations. This situation would adversely affect visual amenity and undermine the qualities of naturalness and remoteness that define the area. The assessment fails to convey the true level of impact or its significance within this sensitive landscape.

Concerns also arise from the methodology used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This shortcoming raises the risk that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked visually and spatially to the Atlantic horizon. The evaluation treats these sites as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 in terms of protecting natural places and historic assets. The extent of the proposed change is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any claims of compliance with policy requirements.

Moreover, it is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is markedly deficient and lacks the necessary detail to properly evaluate potential environmental effects. The proposed activities entail significant seabed preparation and installation operations within a high-energy Atlantic environment, yet there are no well-developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on future mitigation and contingency measures that will be established after consent, which hinders any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures is especially troubling given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, managed, or monitored.

There is also ambiguity surrounding the scale and behaviour of sediment plumes that could result from seabed disruption and cable installation. Without comprehensive modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these disturbances. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents any evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces a procedural risk and undermines the ability of the competent authority to assess environmental protection measures effectively at the determination stage.

From a regulatory standpoint, the delay in implementing critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are evaluated prior to consent; without this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Ultimately, the lack of defined mitigation measures, the absence of comprehensive management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the current application fails to adequately assess the ecological and socio-economic impacts associated with the proposed development. A significant concern is the assumption that fishing activities can be relocated without negative consequences. The lack of evidence supporting the availability of alternative fishing grounds that are both accessible and capable of handling increased pressure is troubling. This omission poses a risk of overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based analysis, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial threats to marine species due to underwater noise during construction activities. The extended use of high-energy hammer piling is expected to create disturbances across considerable distances, impacting species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population raises critical issues, yet the application minimises these effects without providing adequate supporting evidence.

The application also contains inconsistencies, particularly regarding the need for licences to authorise harm to European Protected Species, while simultaneously declaring such impacts as negligible. This contradiction raises doubts about the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially when harm is expected to a level that necessitates legal approval.

Moreover, the evaluation neglects to account for cumulative impacts resulting from various pressures, including habitat disruption, noise, and fishing displacement. The absence of a detailed examination of these interconnected effects hinders the ability to assess the overall consequences on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not sufficiently illustrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby challenging the conclusion that this proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment render it incomplete and untrustworthy. These shortcomings preclude a comprehensive 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 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 assessment of tourism impacts is significantly lacking, failing to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or the economic contributions overall.

Tourism has seen notable growth, escalating from £65 million in 2017 to over £81.5 million, which has supported more than 1,000 jobs and accounted for as much as 16% of the island’s economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality might impact the Tourism Gross Value Added and broader economic resilience. The absence of such analysis prevents an informed determination on whether the development would yield a net economic benefit or harm an established and expanding sector.

Moreover, the assessment does not take into account the crucial role of environmental quality in bolstering tourism, particularly regarding the significance of unspoiled

landscapes and dark skies to visitor experience, as well as the potential of emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a notable void in understanding the impacts on an acknowledged and burgeoning segment of the local economy.

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

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, and fails to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependencies of the island culminates in a significant evidential gap. This inadequacy obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the standards for sustainable development, as evaluated against legal obligations, national policy, and evidential criteria. This application repeats fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being submitted under a more robust policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis needed for a proper assessment of the application. It lacks comprehensive baseline data, continues to employ an undefined design envelope, depends on unspecified mitigation measures, and omits key impact pathways such as those concerning nocturnal wildlife, full onshore infrastructure, and tourism consequences. This results in an incomplete Environmental Impact Assessment, which fails to provide a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural shortcomings are evident. The failure to produce a compliant Island Communities Impact Assessment is a violation of statutory duties under the Islands (Scotland) Act 2018, while not disclosing the complete Social Impact Assessment amounts to a significant omission. Such shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for a lawful

determination.

The proposal directly contravenes the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit owing to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, clouding potential impacts on peatlands, carbon balance, habitats, and agricultural land.

Environmental risks associated with the project remain ambiguous and could be significantly detrimental. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The application does not meet the evidential threshold necessary to confidently conclude that adverse effects can be ruled out, thereby invoking the precautionary principle, which complicates any lawful declaration of acceptable impacts.

Furthermore, the project would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual connections, along with the repercussions for tourism, represent lasting effects that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority should refuse consent on these bases or invoke relevant regulatory provisions to obtain the required 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: BD7E4863

Member of the public 1905

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 proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the scale, proximity, and design of the development raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The documentation provided fails to supply a sufficient evidential foundation for a lawful assessment. There are significant gaps in critical environmental data, with baseline information being both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework utilised does not facilitate a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, there is no comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are notable and serious conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially 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 overall environmental integrity. These issues challenge the statutory tests required for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of this proposal in the area, with substantial turbines situated near the shoreline, raises significant worries about landscape capacity, visual impact, and broader environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking and does not give a complete, clear, or trustworthy overview of the potential environmental effects of the proposal. The flexible Project Design Envelope used does not commit to specific turbine

dimensions, layouts, or configurations. This creates significant uncertainty and hinders the ability to consistently apply a worst-case scenario. As a result, the assessment's integrity is compromised, meaning that the impacts described may not accurately reflect the final development. This prevents both the public and the competent authority from fully understanding the environmental effects.

The application relies on mitigation measures, monitoring strategies, and management plans that have not been defined yet. Seeking consent under these conditions means that any environmental harm will supposedly be addressed later, which undermines a proper evaluation of effectiveness and assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime. This regime requires that significant effects and mitigation measures are clearly identified before a decision is made.

There are also major evidential gaps, including insufficient baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding 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 means that cumulative and worst-case impacts are not clearly understood, resulting in scientific uncertainty that does not meet statutory requirements.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not show compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity. It has not been demonstrated that the impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough evaluation of environmental effects, meaning the competent authority cannot make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application significantly lacks a proper assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of presenting a structured and reasoned comparison of realistic alternatives based on environmental effects, it offers a narrative account of project evolution. This method does not adequately show that less harmful options have been properly identified, evaluated, and chosen over more damaging solutions.

There is a notable absence of a transparent or evidence-based comparison regarding

alternative offshore locations, development scales, or design configurations. The application does not prove that the developer has thoroughly considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the failure to conduct such analysis stops any conclusion that the proposed siting is the least damaging option.

The shortcomings extend to the cable routing and landfall assessment as well, with insufficient evidence that alternative routes have been properly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been applied; instead, there seems to be an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This is a clear deviation from the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency adversely affects adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly inadequate, failing to offer a complete or reliable understanding of the ecological receptors present. This area is characterised as a biologically active and highly sensitive marine system, yet the baseline data collected is insufficient, and the methodologies employed do not effectively capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an incomplete assessment of the possible effects of construction disturbance, noise, and heightened activity, thereby undermining any conclusions that suggest no significant effects on this species.

In addition, the evaluation of basking sharks is flawed, as it relies on aerial surveys that introduce significant detection bias, especially under Atlantic weather conditions. This

methodology is prone to underestimating the presence of basking sharks, particularly when compared to established land-based observations that indicate their frequent usage of these waters. The neglect to incorporate or appropriately consider such data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects that rest on assumptions rather than substantial evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or those of National Planning Framework 4, as there has been insufficient identification or evaluation of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues inhibit a thorough evaluation of impacts on marine ecology and protected species, supporting the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

There exists a fundamental inconsistency within the application itself. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment and suggests that its conclusions lack proper substantiation from the underlying evidence. Additionally, the assessment does not sufficiently establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully take into account the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is

lacking and behavioural responses are not fully understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vital cultural landscape where the environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity in the current application is fundamentally inadequate. It treats heritage merely as a collection of isolated, static assets, overlooking 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 they are categorised as static features in the assessment. This approach neglects their continued use and meaning, failing to consider how development could affect their setting and, ultimately, their role in community life.

Moreover, the assessment lacks consideration of intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These elements are essential to the area's identity, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds 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 undermines the assessment's legitimacy and fails to align with 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 legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, making the determination of the proposal unlawful.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to adequately consider both tangible and intangible heritage, as well as to recognise living cultural practices, marks a clear deviation from policy requirements.

In summary, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application does not provide a robust basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the complete report has not been published. This significant evidential gap limits both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's research. The absence of the full assessment not only inhibits proper scrutiny of the findings but also restricts the determination of the significance of these impacts within the decision-making process.

Summaries of the assessment suggest that residents are currently experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement and are therefore not speculative. Additionally, there is evidence indicating that the proposal poses a direct threat to community identity and cohesion, with findings from the developer indicating a risk of “cultural loss.” Yet, these impacts have not been adequately integrated into the main application nor given appropriate consideration.

The withholding of the full Social Impact Assessment obscures the true human and social costs of the proposed development, undermining the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health impacts for developments of this scale, especially where

community character may be affected. By failing to provide the complete dataset, the application does not present a thorough evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and avoid harm, yet the available evidence points to existing adverse effects that have not been fully revealed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural implications of this situation are significant. The competent authority cannot conduct a rigorous socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and indicates a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped landscape, offering a strong sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a dominant industrial presence that would permanently alter this unique character. The assessment of visual impacts fails to accurately convey the extent of this change. The turbines would significantly affect views from residential areas, historic sites, and popular coastal locations, leading to a loss of visual amenity and diminishing the qualities of naturalness and remoteness.

There are significant concerns about how visual viewpoints were selected and presented. Some viewpoints may not adequately represent the most sensitive areas or worst-case scenarios, especially concerning cultural heritage sites and valuable landscapes. This could lead to an understatement of the visual impact, raising doubts about the assessment's reliability.

Moreover, the assessment does not take into account 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 linked visually and spatially to the Atlantic horizon. By treating these sites as isolated, the assessment fails to consider their interdependent relationships, resulting in an incomplete evaluation of their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and their relationship with the natural horizon. This change represents a visual and broader cultural impact that has not been

properly addressed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The proposed changes are incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a solid worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and location of the turbines, their visual dominance would be unavoidable. Consequently, the change to the landscape would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and strengthen the argument that the proposal is not compatible with the preservation 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, lacking the necessary detail to adequately evaluate the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it depends on mitigation and contingency measures that are to be prepared post-consent. This approach prevents any meaningful assessment of their adequacy or effectiveness, raising substantial concerns regarding the sensitivity of the receiving environment.

The West Lewis coastline is home to clean coastal waters and important habitats that are particularly vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, controlled, or monitored. Additionally, 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, including potential consequences for sensitive marine species and habitats identified within the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a stage following consent, the application hinders the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process. From a regulatory standpoint, the deferral of essential

environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures must be assessed prior to consent. The absence of such critical information renders a lawful determination impossible. The application also fails to demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of the marine environment and fisheries, which are critical to both local ecology and economy. The West Lewis coast is home to a varied marine ecosystem and supports an active fishing industry, yet the application does not adequately address how these vital uses and habitats will be preserved without considerable disruption.

One major concern is the assumption that fishing activities can be shifted without negative repercussions. There is no evidence provided to suggest that alternative fishing grounds exist that are accessible and capable of absorbing the additional pressure resulting from displacement. This critical gap in information raises the risk of overfishing in other areas, potentially leading to wider economic ramifications for the local fishing fleet. Consequently, without a detailed, evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise associated with construction activities. The prolonged use of high-energy hammer piling is anticipated to create disturbances over extensive areas, adversely affecting marine life, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is a serious concern, yet the application minimizes these potential effects and lacks sufficient supporting evidence for such claims.

An inconsistency in the application arises from the acknowledgment of the need for licenses to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction raises doubts about the validity of the assessment and casts a shadow over compliance with the Habitats Regulations, especially where harm is predicted to an extent that necessitates legal authorization.

Additionally, the cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities, are not sufficiently considered. A comprehensive evaluation of these combined effects is essential for understanding the overall impact on marine ecosystems and socio-

economic conditions.

From a policy perspective, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not convincingly establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby hindering any assertion that the proposal aligns with sustainable development principles.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment both incomplete and unreliable. These deficiencies obstruct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves significant onshore infrastructure, which includes cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure through sensitive landscapes. These activities require excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, hindering an understanding of the project's overall environmental footprint.

The separation of offshore turbines and onshore works leads to an incomplete assessment, failing to consider the cumulative effects that arise from what should be treated as a single integrated project. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing proper evaluation of all components together as required by the Environmental Impact Assessment process. Consequently, the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are serious risks to sensitive habitats such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate measures for avoidance have been implemented, indicating a clear evidential gap in biodiversity protection.

Concerns also arise regarding the carbon balance, as the disturbance of peatland may release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this critical issue, leaving it unclear whether the overall carbon balance is genuinely beneficial.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights, with the application lacking evidence of necessary consents or processes being initiated. This raises serious questions about

deliverability and the lawful implementation of the project.

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

In summary, the separation of project components, coupled with the absence of a thorough assessment and a lack of evidence regarding environmental and land use impacts, renders this aspect of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

lawful determination.

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

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

TOURISM

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

Significantly, the tourism sector has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, with more than 1,000 jobs supported and accounting for up to 16% of the island's economy. However, the application neglects to model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it remains unclear whether the proposed development would provide a net economic benefit or harm an already established and flourishing sector.

The assessment fails to recognise the critical role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the implications for a recognised and expanding segment of the local economy.

For an island community that lacks extensive economic diversification, the inadequate evaluation of tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community as a whole. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been assessed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding the economic impact and the

necessity to establish a net benefit. Furthermore, it contradicts strategic objectives that identify tourism as a priority growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough assessment of economic effects, ultimately leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: 78A1E825

Member of the public 1906

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 thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant planning, environmental, cultural, and procedural deficiencies.

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent 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. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, introduces significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, 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 is warranted.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is profoundly insufficient, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interwoven. The application reduces heritage to mere isolated assets, failing to recognise their dynamic social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice, yet they are mischaracterised as static features in the assessment, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This inadequate portrayal leads to a flawed evaluation of cultural effects, ignoring their vital role in community life.

Additionally, the assessment does not take into account intangible cultural heritage elements, including the Gaelic language, traditions, and the deep-rooted relationship between the community and its coastal environment. These aspects are crucial to the area's identity yet are entirely excluded from consideration, marking a significant shortfall. Without evaluating these factors, the cultural ramifications of the development remain unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that meets the recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not align with established principles of participation in matters affecting cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings position the proposal in stark contradiction to National Planning Framework 4, especially concerning the safeguarding of historic assets and places. Ignoring both tangible and intangible heritage and failing to recognise living cultural practices signifies a significant deviation from policy requirements.

In summary, the shortcomings in assessing living heritage, intangible cultural values, community rights, and legal obligations create a considerable evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not establish a solid foundation for understanding the true cultural cost of 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 remains unpublished. This situation creates a significant evidential gap, preventing both the public and the competent authority from fully understanding the social risks identified through the developer's research. Available summaries reveal that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are therefore grounded in reality, not speculation. Nevertheless, the lack of disclosure of the full assessment hinders proper scrutiny of the findings, limiting the ability to evaluate their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is perceived as a threat to community identity and cohesion, with “cultural loss” noted in the developer’s own findings. Despite this, these impacts have not been adequately incorporated into the main application or given appropriate consideration. The failure to publish the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be jeopardised. By withholding the full dataset, the application does not provide a complete evidential basis 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 must foster positive health outcomes and mitigate harm; however, the evidence presently available points to existing adverse effects that have not been fully revealed. In the absence of the complete assessment, compliance with this policy remains unproven.

The procedural implications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application, failing to meet the evidential requirements outlined by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines near the West Lewis coastline presents significant shortcomings in the assessment of seascape, landscape, and visual impacts. This coastline, characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness, would face fundamental alterations due to the

introduction of an industrial presence in close proximity to the shoreline. Such a transformation is not only significant but also permanent and irreversible, fundamentally changing the landscape character.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, yet the application does not adequately evaluate the ecological or socio-economic impacts of the proposal. A critical concern lies in the assumption that fishing activity can be displaced without consequences, with no evidence provided

to support the availability or accessibility of alternative fishing grounds capable of sustaining additional pressure. This lack of information is significant, as it poses risks of overfishing elsewhere and could have wider economic repercussions for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries considerable risks for marine species, notably due to the underwater noise resulting from construction activities. The extended use of high-energy hammer piling is expected to cause disturbances over large distances, affecting species such as dolphins. The potential impact on a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

There exists a clear inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing such impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking, failing to consider the full scope of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. Excavation will occur in areas of deep peat, notably

within Barvas Moor, an important carbon store and ecologically delicate habitat. As a result, the application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The failure to assess the onshore impacts, whether by exclusion or deferral, inhibits proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively. However, the division of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and communities remain inadequately understood.

Furthermore, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not demonstrate a thorough evaluation of impacts on these habitats or the application of appropriate avoidance measures, thus revealing a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or show that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising concerns over both deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change will fundamentally alter the night-time environment of the West Lewis coastline, which is noted for its exceptionally dark skies. The dark skies not only contribute to the environmental quality of the area but also play a significant role in its cultural identity and tourism value.

A crucial oversight within the Environmental Impact Assessment is the complete lack of

evaluation regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the growing importance of dark skies to tourism sectors such as astro-tourism, this omission is particularly significant. Furthermore, the assessment fails to address potential 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 lead to disorientation and a heightened risk of collisions.

The application does not include any lighting impact assessment or phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the likelihood of increased mortality. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has been overlooked. The absence of site-specific night-time data creates a critical gap in the understanding of ecological impacts.

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

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, the lack of consideration for night-time character undermines the broader assessment of landscape and seascape impacts.

Overall, the absence of any assessment concerning dark skies and nocturnal wildlife presents a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for supporting a 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 Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

Moreover, the application exhibits clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under

the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

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

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

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

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

Additional Comments

I feel that this planned project is going to seriously harm the community that I come from, the impact of such a project is going to have damaging and long lasting effects on the area which will include social decline, and impact the value of properties that will have their natural views and peaceful environment ruined by this project. This will be devastating in so many ways and ultimately have a huge negative impact on communities that will dwindle and not thrive as both expected and desired.

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: B5EB1654

Member of the public 1907

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 relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents. It highlights significant deficiencies in planning, environmental assessments, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project in relation to statutory obligations, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful decision. Important environmental data is absent, baseline information is inadequate and inconsistent, and key details of the proposal remain unspecified. The flexible design framework employed complicates understanding of potential significant impacts, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or insignificant effects that lack robust backing.

There are evident and serious policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the development's acceptability within policy frameworks.

This development's scale is unprecedented for the area, with large turbines proposed near the shoreline, raising significant issues about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on vague mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and unfit for lawful consideration. Given these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is flawed and fails to provide a comprehensive and trustworthy account of the likely environmental effects associated

with the proposal. The incorporation of a flexible Project Design Envelope, which lacks specific details regarding turbine dimensions, layouts, or configurations, introduces a considerable level of uncertainty. This ambiguity hinders the application of a worst-case scenario approach, ultimately undermining the integrity of the assessment. Consequently, the potential impacts outlined may not accurately represent the development that will be constructed, leading to a lack of clarity for both the public and the competent authority regarding the true extent of environmental effects.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed at a later stage obstructs any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before determination.

There are notable evidential gaps present, such as deficiencies in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information hampers the understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not fulfil the evidential standard required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This scenario activates the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not comply with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and rigorous evaluation of environmental effects, placing the competent authority in a position where it cannot make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to meet the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the project's evolution. This approach does not adequately demonstrate that less

harmful options have been identified, assessed, and selected over more damaging ones.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the developer has not shown that serious consideration has been given to positioning turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in evaluating impact, the absence of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

These deficiencies extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been employed, relying instead on post-design mitigation measures.

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

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

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 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 cultural heritage and community identity surrounding the proposed development is severely lacking. It does not recognise the West Lewis coastline as a living cultural landscape, where elements such as environment, language, tradition, and community are all interconnected. Instead, the application simplifies heritage to isolated, static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, are treated inadequately. These cemeteries serve as active places of burial and spiritual practice. However, the assessment characterises them merely as static features, overlooking their continued significance and the development's potential

impact on their surroundings. This misrepresentation leads to an incomplete cultural evaluation and dismisses their importance in community life.

Moreover, the application fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity but are notably absent from the assessment. This oversight prevents a proper understanding of the development's cultural implications.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which has a distinct cultural identity similar to that of an Indigenous People, has not been consulted in a meaningful way. The lack of a process for Free, Prior and Informed Consent undermines the assessment's validity and overlooks the established principles of participation in matters affecting cultural and environmental interests.

A significant procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, making the decision unlawful.

These shortcomings put the proposal in conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to address both tangible and intangible heritage, as well as to acknowledge living cultural practices, deviates from policy requirements.

Overall, the inability to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not provide a sufficient foundation for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment fundamentally undermines the evaluation of social impacts, health, and wellbeing related to this proposal. The developer has commissioned a Social Impact Assessment that included local residents in focus groups; however, the complete report remains unpublished. This significant evidential gap prevents both the public and the competent authority from fully understanding the social risks identified in the developer’s own research.

Summaries that are available reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are therefore not speculative. The lack of transparency regarding the full assessment restricts proper scrutiny of the findings and hinders the ability to assess their

importance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer indicating a risk of “cultural loss.” Despite this recognition, such impacts have not been adequately integrated into the main application or given the necessary attention. The failure to disclose the complete Social Impact Assessment thus obscures the true human and social costs associated with the development.

The implications for the Environmental Impact Assessment process are substantial. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be jeopardised. The application, by withholding this vital information, lacks a complete evidential basis to appropriately evaluate the balance between benefits and detriments.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 regarding health and wellbeing. Development must foster positive health outcomes and prevent harm; however, the evidence available suggests the existence of adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a critical omission within the application and a failure to satisfy the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation hinders a lawful determination and reinforces the argument that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines in close proximity to the West Lewis coastline threatens to fundamentally alter the area's character, which is defined by its open Atlantic horizon and a strong sense of remoteness. This industrial presence would result in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it does not adequately reflect the scale of change or the sensitivity of the receiving environment.

Visual impacts are understated, as the application fails to fully capture the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities that define naturalness and remoteness. Moreover,

the assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight risks underestimating the visual impact, thereby undermining the reliability of the assessment.

The interconnected relationship between landscape, seascape, and cultural heritage has not been sufficiently assessed. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting that relies on visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and disconnecting them from the natural horizon. This not only represents a visual impact but also leads to broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The anticipated scale of change is inconsistent with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

The impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. As a result, the change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The application presents significant concerns regarding the incomplete assessment of construction and pollution risks, which lacks the necessary detail for evaluating potential environmental effects. It involves extensive seabed preparation and installation works in a challenging high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on the development of

mitigation and contingency measures after consent is granted. This approach hinders any meaningful assessment of their sufficiency or effectiveness.

The environmental sensitivity of the receiving area heightens these worries. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disruption and contamination. While the application acknowledges risks such as sediment mobilisation and possible accidental chemical or oil spills, it fails to detail how these risks will be prevented, managed, or monitored effectively.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it remains impossible to ascertain the potential extent, duration, or ecological implications of these impacts. This uncertainty further extends to the possible effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards exist to handle pollution incidents. This deferral introduces procedural risks and diminishes the competent authority's ability to effectively assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment framework. Assessment of likely significant effects and necessary mitigation must occur prior to consent, and absent such information, a lawful determination cannot be reached. Additionally, the application does not sufficiently demonstrate compliance with policy mandates regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, inadequate management plans, and uncertainty around potential impacts leads to a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to an active fishing industry and a diverse marine ecosystem. The proposal's assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. A critical concern is the unfounded assumption that fishing activity can be displaced without significant consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of handling increased pressure. This gap in information is vital, as the risk of overfishing in other areas could have far-reaching economic implications for the local fishing fleet. Without a solid, evidence-based assessment, understanding the effects on fisheries and local

livelihoods remains impossible.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise created during construction. The anticipated use of high-energy hammer piling over an extended duration is likely to disturb marine life over large areas, which is particularly concerning for species like dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population raises alarm, yet the application diminishes the seriousness of these effects, lacking sufficient evidence to justify such an assertion.

Additionally, there exists a troubling inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged even as impacts are simultaneously deemed negligible. This contradiction erodes the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when anticipated harm requires legal authorisation.

The evaluation also neglects to consider cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive appraisal 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 does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development.

In summary, the assessment is incomplete and unreliable due to a lack of evidence on fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies. These shortcomings hinder a robust evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not take into account the full extent of impacts from what is a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. This construction includes excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental

footprint.

By deferring or excluding the assessment of onshore impacts, the application does not allow for a proper evaluation of cumulative effects. Environmental Impact Assessment requires that all parts of a project are considered together, but the distinction between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

There are also considerable risks to sensitive habitats such as machair systems and peatland environments, which have policy protections. The application does not show that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been taken, creating a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance are also raised by the proposal. Disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is beneficial.

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

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 prove 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 on environmental and land use impacts render this part of the application incomplete and unreliable, making a lawful determination impossible.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This significant alteration of the night-time environment threatens the exceptionally dark skies of the West Lewis coastline, which are essential to the area's environmental quality, cultural identity, and tourism value. The application fails to assess the impacts of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the crucial role dark skies play in the region's identity and in emerging sectors such as astro-tourism.

Moreover, there is a complete lack of evaluation regarding the impact on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s

Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and elevate collision risks. The absence of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting may affect these species or contribute to increased mortality rates. This gap is further compounded by the reliance on daytime survey data in the ornithological assessment, which neglects to capture nocturnal activity or the associated risks. Vulnerable species, such as Kittiwakes, which forage or migrate at night, remain unassessed in terms of their risk of disorientation from artificial lighting.

Without a comprehensive assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The failure to meet the evidential standard required to exclude adverse effects beyond reasonable scientific doubt invokes the precautionary principle, thereby precluding a lawful determination. Additionally, 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 thorough assessment of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In conclusion, the lack of assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and 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 proposal for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the requirements for sustainable development as dictated by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in several key areas.

There are serious deficiencies in the evidence provided for assessment. The proposal lacks a comprehensive and reliable evidential basis, with critical gaps in baseline data and the use of an undefined design envelope. It relies on unspecified mitigation measures and neglects to address important impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings. The omission of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment represents a significant oversight. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Additionally, the proposal contradicts National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not adequately

demonstrate that health and wellbeing impacts are acceptable nor provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential standard needed to dismiss 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.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either denies consent based on these grounds or exercises the appropriate regulatory measures to require the submission of the necessary missing information. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I rely heavily on tourism for my business - I feel my income will be detrimentally affected by this.... I think there will be very little - almost zero - financial gain locally

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: 6A5C6981

Member of the public 1908

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary rigor and completeness, failing to deliver a full and transparent account of the potential environmental effects associated with the proposal. The reliance on a flexible Project

Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces a high degree of uncertainty. This approach undermines the reliability of the assessment, as it is impossible to ascertain a worst-case scenario. As a result, the impacts presented may not accurately reflect the actual development, thereby preventing both the public and the competent authority from grasping the true extent of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under such conditions implies that any environmental harm will be addressed after approval, which obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established prior to any decision.

Additionally, there are considerable evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These issues contribute to uncertainty surrounding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of comprehensive information hampers a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not meet the evidential standards required by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This scenario triggers the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations relating to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns regarding the adequacy of the alternatives assessment, which fails to meet the requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on environmental consequences, the application merely recounts the evolution of the project. This method does not adequately demonstrate

that less damaging options have been properly evaluated and chosen over more harmful solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity, yet the baseline data remains incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A critical shortcoming is the inadequate recognition and assessment of otters, a European Protected Species, which actively use coastal areas for foraging and movement. The application does not take into account their core foraging range or

behavioural patterns, leading to an insufficient evaluation of the potential effects caused by construction disturbances, noise, and increased activity. This oversight compromises any conclusions drawn about the absence of significant effects on this species.

Similarly, the assessment of basking sharks is flawed due to the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence when compared with established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data undermines the baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based 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 interactions within the wider ecosystem. This uncertainty raises concerns about the actual risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis threatens internationally important seabird populations, which are already experiencing declines. The ornithological assessment associated with the application is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that compromise its conclusions. It fails to adequately demonstrate that these species will not face adverse effects, particularly since the turbines are sited within key foraging areas and migratory pathways. The assessment lacks a robust evaluation of displacement, collision risk, or habitat loss, which is essential for understanding the potential impacts on these vulnerable birds.

Furthermore, the application presents a contradiction by asserting that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and

indicates that its conclusions are not sufficiently supported by evidence. It does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. Additionally, the methodologies applied likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not well understood.

The placement of turbines in a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term implications of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, fails to achieve the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and undermines a lawful conclusion in favour of consent. Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment neglects to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. It adopts a simplistic approach, viewing heritage merely as a collection of isolated, static assets, rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

Key culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These active places of burial and spiritual practice are mischaracterised as static features, without consideration of their ongoing use and significance, nor the development's impact on their setting. This oversight leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the

Gaelic language, traditions, and the community's deep-rooted connection to the coastal environment. These crucial elements of local identity are conspicuously absent from the evaluation, highlighting a significant deficiency. Without their inclusion, the cultural implications of the development remain poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and disregards established principles of participation in matters affecting cultural and environmental interests.

A critical procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment precludes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, undermining lawful determination.

From a policy standpoint, these inadequacies directly contradict the National Planning Framework 4, particularly regarding the protection of historic assets and places. The omission of both tangible and intangible heritage and the failure to acknowledge living cultural practices signify a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately assessed, leaving the application without a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful appraisal. The developer has undertaken a Social Impact Assessment that included focus groups with local residents; however, the comprehensive report remains unpublished. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified in the developer's own research.

Summaries available to the public suggest that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These concerns stem from direct engagement, and thus are not merely speculative. The lack of disclosure regarding the complete assessment limits scrutiny of its findings and hampers the evaluation of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's

findings. Nonetheless, these implications have not been properly integrated into the main application or afforded the appropriate consideration. By withholding the full Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. An understanding of social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functionality are at stake. The failure to provide the complete data set results in the application lacking a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence available indicates pre-existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural consequences of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission within the application represents a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which is essential to its undeveloped character. The proposal for large-scale turbines in close proximity to the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The magnitude of visual change associated with this application is inadequately represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not fully capture the sensitivity of key cultural heritage sites or the worst-case scenarios, particularly

concerning high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, which undermines the reliability of the assessment.

Furthermore, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape context linked to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital connections, disrupting how heritage assets are experienced in relation to the natural horizon. This represents not only a significant visual impact but also broader cultural and spatial harm that has not been adequately assessed.

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

Additionally, 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 fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

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 prevent 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 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 application does not adequately assess the impacts on fisheries and marine life, lacking a thorough evaluation of ecological and socio-economic consequences. Off the West Lewis coast, a vibrant marine ecosystem coexists with an active fishing industry, yet the proposal fails to ensure the protection and sustainability of these critical habitats and activities without causing significant disruption.

A notable concern is the assumption that fishing activities can be relocated without repercussions. There is no substantiated evidence provided that alternative fishing grounds are available or can accommodate the added pressure from displaced fishing efforts. This gap in assessment is crucial, as such displacement poses the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. The absence of a comprehensive and evidence-based analysis limits the understanding of potential impacts on fisheries and the livelihoods dependent on them.

The proposal poses considerable threats to marine species, especially due to the underwater noise created during construction. The prolonged use of high-energy

hammer piling is predicted to disturb marine life over extensive distances, notably affecting populations such as the local bottlenose dolphins. The anticipated disturbance to a considerable portion of this dolphin population raises significant alarm, yet the application diminishes the importance of these impacts without adequate supporting evidence.

There exists a clear contradiction within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This inconsistency undermines the reliability of the assessment and raises critical concerns regarding adherence to the Habitats Regulations, particularly when legal authorisation for anticipated harm is necessary.

Furthermore, the application neglects to address the cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it becomes impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the proposed development can coexist with current marine users or avoid unacceptable adverse effects on marine biodiversity, thus precluding any determination that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is significantly lacking, failing to account for the full range of impacts associated with what constitutes a singular integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated independently. This fragmented approach obscures the comprehensive scale of the environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not offer a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application impedes

a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively, yet the disconnection between offshore and onshore elements results in a lack of clarity regarding the combined effects on peatlands, habitats, and local communities. There are also considerable threats to sensitive habitats, including machair systems and peatland environments, which are designated for policy protection. The application fails to show that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, revealing a significant evidential gap regarding biodiversity protection.

Furthermore, the routing of 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 processes have been initiated, prompting concerns over deliverability and lawful execution. From a policy standpoint, the inability to assess the project comprehensively and to illustrate the protection of peatlands, habitats, and land use interests stands in contradiction to the National Marine Plan and National Planning Framework 4. The lack of demonstration that impacts can be avoided or mitigated further undermines the credibility of the application.

Overall, the separation of project elements, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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

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

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

In the context of an island community that has limited economic diversification, the neglect of tourism impact assessments carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities, as

required under the Islands (Scotland) Act 2018, have not been evaluated.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite now 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 concerns.

There are significant deficiencies in the evidential basis provided for consideration. The application lacks comprehensive baseline data, employs an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it fails to include critical impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is insufficient, leaving uncertainties regarding likely significant effects and residual impacts.

Procedural inadequacies further undermine the application. The failure to produce a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the non-disclosure of 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, thus rendering the application unsuitable for determination.

Additionally, the proposal conflicts with National Planning Framework 4. It does not adequately protect biodiversity, natural spaces, and cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of net economic benefits due to insufficient tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and may be

significantly detrimental. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and barring a lawful determination that impacts are acceptable.

The proposal would also 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 connections, and adverse impacts on tourism represent permanent changes that cannot be sufficiently mitigated.

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

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: 61298457

Member of the public 1909

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, challenging its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of its impact. The use of a flexible design framework obscures likely significant effects, while unspecified mitigation measures prevent assessment of their effectiveness. Consequently, the documentation does not facilitate a fully informed understanding of the environmental, cultural, or community impacts, and the assertion of negligible or non-significant effects lacks robust evidence.

Substantive policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

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 application for the proposed development lacks the evidential rigor necessary to conclude that there will be no adverse effects on protected sites. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. However, the assessment fails to adequately

demonstrate that these species will remain unaffected. Furthermore, the siting of turbines within a recognised migratory corridor poses an additional and substantial risk, as it potentially obstructs a primary flight path for species migrating between the United Kingdom and Iceland. The implications of sustained mortality within this corridor have not been sufficiently evaluated.

A critical inconsistency within the application arises from the developer's assertion of no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This case is required only when significant harm is anticipated, casting doubt on the reliability of the assessment and suggesting that the conclusions drawn are not substantiated by the supporting evidence. Moreover, the methodologies employed are likely to underestimate mortality rates, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The assessment does not sufficiently consider the importance of key feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda, and the reliance on modelling approaches introduces further uncertainty.

From a regulatory standpoint, the assessment does not meet the evidential threshold needed to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, which precludes a lawful conclusion in favour of consent. Additionally, the deficiencies highlighted reflect non-compliance 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 conclusion, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidential support. These flaws hinder a robust evaluation of potential impacts and contribute to the overall determination that the application does not satisfy the statutory requirements necessary for approval.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies. These dark skies are vital to the area's environmental quality, cultural identity, and tourism value, yet the Environmental Impact Assessment completely omits any consideration of dark skies and nocturnal wildlife.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the significant importance of dark skies to local identity and emerging tourism sectors, including

astro-tourism. This lack of assessment creates a clear gap in the overall landscape and environmental evaluation.

Moreover, the assessment does not address the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risk. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting could affect these species or raise mortality rates.

This omission is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

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

From a policy standpoint, this omission is at odds with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

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

TOURISM

The application acknowledges that 86% of visitors are attracted to the Isle of Lewis due to its scenery. However, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution of tourism. This oversight is critical, given that tourism plays a significant role in the local economy, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy.

Furthermore, the assessment does not consider how the industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or

jeopardise a vital and expanding sector.

In addition, the role of environmental quality is not addressed, specifically regarding unspoiled landscapes and dark skies, which are crucial to visitor experience and emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, resulting in a significant gap in understanding the impacts on a recognised and growing sector of the local economy.

The implications extend beyond just tourism; in an island community with limited economic diversification, the lack of a comprehensive assessment of tourism impacts raises concerns for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been evaluated.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity of proving net benefit. It conflicts with 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, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This shortcoming hampers a thorough evaluation of economic effects and contributes to 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 standards of sustainable development in light of statutory obligations, national policy, and evidential requirements. This proposal mirrors the central issues that resulted in the rejection of the Lewis Wind Power project in 2008, where the level of industrialisation was deemed unacceptable. The current proposal is presented under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for this application. There are deficiencies in baseline data, an undefined design envelope, unspecified mitigation measures, and the exclusion of important impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete and does not provide a comprehensive understanding of potential significant effects or residual impacts.

Furthermore, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment is a substantial omission. These issues hinder the competent

authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and cannot show a net economic benefit due to a lack of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

There are also significant uncertainties regarding environmental risks. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard necessary to confidently exclude adverse effects has not been fulfilled, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would cause considerable and irreversible alterations to a delicate landscape. The industrialisation of the coastline facing the Atlantic, the loss of dark skies, disruption to cultural and visual connections, and effects on tourism represent permanent changes that cannot be mitigated to an acceptable degree.

In summary, the application is both procedurally and substantively inadequate for determination. The numerous information deficiencies, along with policy conflicts and unresolved environmental risks, prevent a lawful and evidence-based decision. The competent authority must therefore refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the necessary missing information.

A formal request is made 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: 18065D03

Member of the public 1910

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and supporting documentation has identified several significant deficiencies in material planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a significant absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key aspects of the proposal remain ill-defined. The use of a flexible design framework obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the available documentation fails to offer a comprehensive or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are evident and substantive conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests required for consent, thus undermining the ability of the competent authority to deem the development acceptable within policy parameters.

The scale of this proposal is unprecedented for the location, with large turbines positioned close to the shoreline. This raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial transparency and fails to provide a comprehensive account of the potential environmental effects of the

proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This situation hampers the ability to apply a worst-case scenario consistently, compromising the assessment's integrity and obscuring the true environmental impacts. Consequently, both the public and the competent authority are deprived of a clear understanding of the real extent of the proposal's effects.

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

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

As a result, the application does not fulfil the evidential standards mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly flawed. It does not deliver a complete understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically vibrant, yet the baseline data used is lacking. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a reliable basis for understanding potential impacts.

A significant oversight is found in the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the possible effects of disturbances from construction, noise, and increased activity have not been thoroughly evaluated. This lack of attention to otters undermines any claims about the absence of significant impacts on this species.

The assessment of basking sharks also shows notable deficiencies. The reliance on aerial surveys creates considerable detection bias, particularly in Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate frequent usage of these waters. Neglecting to incorporate or adequately assess this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on sound evidence. The insufficient baseline data also obstructs a meaningful examination of cumulative and indirect effects, including variations by season and interactions within the broader ecosystem. This results in uncertainty regarding the true extent of risks posed to marine species and their habitats.

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

In summary, the combination of incomplete baseline data, inadequate methodologies, and unfounded conclusions leads to an unreliable assessment. These issues hinder a thorough evaluation of the impacts on marine ecology and protected species and result in the overall determination that the application does not have a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the application fails to convincingly demonstrate that these species will not be adversely affected. Located within key foraging areas and migratory pathways, the development does not adequately evaluate the implications of potential displacement, collision risks, or habitat loss.

A crucial contradiction arises within the application, wherein the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats

Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn lack adequate support from the underlying evidence. Furthermore, the assessment does not sufficiently prove that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is underrepresented, and the reliance on modelling methods introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to assess the long-term implications of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential standards required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary to support its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in relation to the proposed development is fundamentally flawed, as it overlooks the West Lewis coastline's significance as a dynamic cultural landscape. This landscape is characterised by an intricate connection between the environment, language, tradition, and the community itself. Unfortunately, the application simplifies heritage into isolated, static entities, neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which are vital places for burial and spiritual practice. The assessment reduces these active sites to mere static features, ignoring their continued use and the implications of development on their

surroundings. This failure leads to an inadequate evaluation of cultural impacts and disregards their importance to community life.

Moreover, the assessment neglects to consider intangible cultural heritage, such as the Gaelic language and traditions, along with the deep-rooted relationship between the community and the coastal environment. These elements are vital to the area's identity yet are completely omitted from the evaluation, representing a substantial oversight. Without acknowledging these factors, the true cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the necessary process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to recognised principles of participation in decisions that affect cultural and environmental interests.

A serious procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the relevant authority cannot adequately fulfil its legal obligations to consider the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these oversights put the proposal at odds with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, represents a significant deviation from policy standards.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory requirements create a substantial evidential gap. The cultural ramifications of the development have not been appropriately examined, and the application lacks a solid foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment represents a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's own research. Summaries indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore grounded in reality. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the capacity to determine their significance in the decision-making process.

Moreover, there is a clear perception that the proposal poses a direct threat to

community identity and cohesion, with “cultural loss” highlighted in the developer's findings. Despite the recognition of these impacts, they have not been adequately integrated into the main application or given appropriate weight, as the withholding of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this nature, especially when community character and functioning are at stake. The application's failure to provide the complete dataset results in an incomplete evidential basis for assessing the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the available evidence suggests existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy.

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

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts renders the assessment incomplete and unreliable. This ultimately prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is insufficient and does not capture the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed large-scale turbines situated near the shoreline would result in a continuous and dominant industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application does not adequately convey the extent of this visual change. Given the scale and closeness of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the level of impact or its importance in relation to such a sensitive landscape.

Concerns arise regarding the choice and presentation of visual viewpoints. There is evidence that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, which affects the assessment's reliability.

Additionally, there is a failure to consider 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 interlinked visually and spatially with the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are understood and their connection to the natural horizon. This constitutes not just a visual impact but also a broader cultural and spatial damage that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which emphasises the need to protect natural areas and historic assets. The degree of change proposed does not align with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy conformity.

It is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Consequently, the resultant change is not something that can be reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the view that the proposal conflicts with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on undefined future measures is particularly concerning due to 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. Although the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed before consent is granted; the absence of such information means a lawful determination cannot be achieved. The application further fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a concerning inadequacy in the assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate that these vital uses and habitats can be preserved without significant disruption.

One of the major concerns is the flawed assumption that fishing activity can be displaced without repercussions. The absence of evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle increased pressure is notable. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, it remains impossible to accurately gauge the impacts on fisheries and the livelihoods that depend on them.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb a wide area, potentially affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious red flags, yet the application downplays these concerns without adequate supporting evidence.

There is a glaring inconsistency in the application where the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously, the impacts are described as negligible. This contradiction casts doubt on the credibility of the assessment and raises serious compliance issues with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Lacking a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the proposal can be considered sustainable development.

Overall, the deficiencies in demonstrating evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application result in an incomplete and unreliable assessment. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is significantly incomplete and does not consider the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are closely connected, yet their assessment occurs in isolation. This leads to a fragmented approach, masking the true extent of both environmental and socio-economic consequences.

The onshore components encompass cabling that runs across protected moorland, the construction of a substation located near Stornoway, and the required access infrastructure through sensitive landscapes. These activities involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which obstructs a complete understanding of the overall environmental footprint of the project.

By omitting or postponing the assessment of onshore impacts, the application

precludes a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project are reviewed collectively; however, the disjointed assessment of offshore and onshore components leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application fails to show that impacts on these vital habitats have been fully evaluated or that suitable avoidance measures have been implemented. This reveals a substantial evidential gap concerning biodiversity protection.

Furthermore, 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 requisite consents or processes have been initiated, which raises concerns about the feasibility and legality of the proposed implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in shaping the area's cultural identity, environmental quality, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating an intrusive and continuous "wall of light" effect across the western horizon. This alteration would significantly disrupt the night-time environment, yet the application fails to assess the implications of such lighting on visual amenity, landscape character, or the experiences of local residents and visitors.

The absence of an evaluation of impacts on nocturnal wildlife is particularly concerning. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The proposal does not include a lighting impact assessment or a study on phototaxis, neglecting to consider how the introduction of aviation lighting may affect these vulnerable species or lead to increased mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activities and associated risks faced by species such as Kittiwakes, known to forage or migrate at night. This lack of site-

specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of the nocturnal effects, it becomes 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, necessitating the application of the precautionary principle and thereby precluding a lawful determination.

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, they undermine a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an essential component of the overall ecology.

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

TOURISM

The assessment of tourism impacts within the application is inadequate and neglects to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscapes, dark skies, and sense of remoteness. It is noted that 86% of visitors are attracted by the scenery; however, the application does not provide a quantifiable assessment of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution they make.

Tourism on the Isle has experienced substantial 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. Despite this notable growth, the application fails to evaluate how the potential industrialisation of the seascape and degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this essential analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. This is increasingly pertinent for burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the implications for a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the

failure to evaluate the impact on tourism carries broader consequences for employment, local enterprises, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as stipulated by the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, to assess the environmental factors that drive visitor behaviour, and to consider the island's economic dependence culminates in a significant evidential gap. This undermines a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the fundamental concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application, however, emerges under a strengthened policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are critical gaps in the evidential basis provided for decision-making. The application is marred by an undefined design envelope, missing key mitigation measures, and omissions concerning the impacts on nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of significant effects and residual impacts.

Procedural missteps are also evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a significant omission. These inadequacies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

This proposal is fundamentally at odds with the National Planning Framework 4. It fails to ensure the protection of biodiversity and cultural heritage, does not adequately assess health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, there has been inadequate assessment of the cumulative impacts of both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks posed by the proposal are not only uncertain but potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The requisite evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal also threatens to cause considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption to cultural and visual relationships, alongside tourism impacts, will result in permanent effects that cannot be adequately mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6FC66ABE

Member of the public 1911

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

Dear Sir/Madam

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

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

There are evident and serious policy conflicts inherent in this proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and the well-being of communities. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and undermine the competent authority's capacity to conclude that the development meets policy standards.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report exhibits significant shortcomings and fails to deliver a comprehensive, transparent, or dependable evaluation of the anticipated environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty inhibits the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be realised, hindering both public understanding and the competent authority's capacity to comprehend the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be articulated. The request for consent is predicated on the assumption that environmental harm will be mitigated at a later date, which undermines the ability to thoroughly evaluate the effectiveness of such measures or assess any residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined prior to any determination.

Moreover, there are notable deficiencies in the evidential basis, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly when conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

As a result, the application does not satisfy the evidential requirements set forth by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially in regard to protected species and sensitive habitats. The proposal also falls short of demonstrating compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully evaluated or if appropriate safeguards have been established.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough 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 fundamentally insufficient and does not adhere to the statutory obligations of the Environmental Impact Assessment process. Instead of offering a methodical and reasoned comparison of viable alternatives based on their environmental consequences, the application merely recounts the development's evolution. This method fails to prove that less harmful options have been appropriately identified, assessed, and chosen over more damaging ones.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application does not show that the developer has genuinely contemplated positioning turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact mean that the absence of this analysis hinders any conclusion that the proposed siting is the least damaging option.

Moreover, deficiencies are evident in cable routing and landfall assessment. There is inadequate evidence that alternative routes have been properly considered to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to provide a clear avoidance strategy and comparative analysis indicates that design mitigation has not been employed, relying instead on measures taken after the design phase.

Consequently, the application does not show that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This represents a breach of the established mitigation hierarchy, leaving the competent authority unable to ascertain whether less harmful and more suitable alternatives are available. A thorough assessment of alternatives is necessary to conclude that the proposal is sustainable and compliant with policy.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, especially concerning the safeguarding of natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that adds to the overall conclusion that the application has not undergone sufficient evaluation and cannot receive a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with this application is significantly lacking, failing to offer a complete and trustworthy understanding of the ecological receptors within the West Lewis coastal area. This marine environment is both highly sensitive and biologically active, yet the baseline data presented is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat utilisation of various species, which compromises the ability to assess potential impacts reliably.

Particularly concerning is the omission regarding otters, classified as a European

Protected Species. The application inadequately acknowledges their active use of the coastal regions for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the potential impacts stemming from construction-related disturbances, noise, and increased human activity have not been thoroughly assessed, undermining claims of no significant effects on this species.

Moreover, the assessment of basking sharks suffers from deficiencies, as it relies heavily on aerial surveys, which introduce substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate they frequently utilise these waters. The oversight of relevant data leaves the baseline incomplete and further weakens the credibility of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on unsubstantiated assumptions rather than sound evidence. Additionally, the lack of comprehensive baseline data hampers meaningful evaluations of cumulative and indirect impacts, failing to account for seasonal variations and broader ecosystem interactions. This situation results in uncertainty regarding the actual risks faced by marine species and habitats.

Regulatory obligations are also not met, as the application does not adequately identify or assess protected species, failing to satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created prevents the assurance of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of ornithological impacts is fundamentally inadequate, presenting significant gaps in evidence and inconsistencies that compromise its conclusions. The application does not convincingly show that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline, will remain unaffected. The development site lies within critical foraging areas and migratory routes, yet fails to thoroughly assess the potential risks of displacement, collision, or habitat loss for these species.

A core contradiction arises within the application, as it asserts no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, a requirement that only emerges when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that its conclusions lack sufficient backing from the evidence provided.

Moreover, the evaluation does not adequately address the potential impacts on seabirds linked to protected sites, including the Lewis Peatlands and St Kilda. The significance of these feeding grounds has not been fully recognised, and the use of modelling methods introduces further uncertainty, particularly concerning species in critical decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the unclear understanding of species' behavioural responses.

The positioning of turbines within a designated migratory corridor presents a substantial risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application inadequately considers the long-term consequences of sustained mortality in this corridor and fails to assess the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, in conjunction with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, undermining any lawful basis for consent.

Additionally, the identified shortcomings indicate a non-compliance with the National Planning Framework 4 regarding the protection of biodiversity and the preservation of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly conflicts with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

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 landscape, seascape, 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 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 assessment of marine life and fisheries within the application is incomplete and does not adequately evaluate the ecological or socio-economic impacts. The waters near the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not demonstrate that these habitats and uses can be protected without significant disruption.

A major concern lies in the assumption that fishing activities can be displaced without negative effects. The application fails to provide evidence that alternative fishing grounds are available or can support the added pressure from displaced fishing. This lack of information is crucial, as such displacement could lead to overfishing in other areas and negatively impact the local fishing fleet's economy. Without a thorough and evidence-based evaluation, the effects on fisheries and livelihoods remain unclear.

The proposal poses substantial risks to marine species, particularly due to the underwater noise generated by construction activities. The use of high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, impacting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimises the significance of these impacts without adequate supporting

evidence.

There is a notable contradiction within the application; it acknowledges the need for licences to harm European Protected Species, yet simultaneously describes the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment 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 avoid unacceptable impacts on marine biodiversity. This prevents any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant shortcomings in its assessment of onshore infrastructure, which is critical to understanding the full impact of what is fundamentally an integrated project. The offshore turbines and the associated onshore works are interdependent, yet they have been evaluated separately. This division results in a fragmented analysis that fails to capture the comprehensive environmental and socio-economic repercussions.

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. Notably, the excavation required for these works occurs in areas of deep peat, particularly in Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's environmental footprint.

By postponing or omitting the evaluation of onshore impacts, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively, yet the segregation of offshore and onshore components obscures the total impacts on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application fails to adequately demonstrate that the impacts on these habitats have been fully considered or that effective avoidance measures have been applied, leading to a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbing peatland results in the release of stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this critical issue or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on the project's feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project as a whole, alongside the inability to ensure protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation of impacts further diminishes the reliability of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 assessment of tourism impacts within the application is fundamentally inadequate, neglecting to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. The success of tourism is intricately linked to the area's wild coastline, near-pristine landscapes, dark skies, and a prevailing sense of remoteness. Notably, the application acknowledges that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified evaluation of how the proposed large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions derived from tourism.

This sector has experienced substantial growth, with its value rising from £65 million in 2017 to over £81.5 million, thereby supporting in excess of 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not model the potential impacts of industrialisation on the seascape or the anticipated decline in environmental quality on Tourism Gross Value Added or broader economic resilience. As a result, it remains unclear whether the proposed development would yield a net economic benefit or detract from an established and thriving industry.

Furthermore, the assessment neglects to address the significance of environmental

quality in enhancing the tourism experience, particularly highlighting the crucial role of unspoiled landscapes and dark skies in attracting visitors. The absence of a Dark Skies Assessment exacerbates this inadequacy, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy, notably nature-based tourism and astro-tourism.

In light of the island community's limited economic diversification, the failure to assess tourism impacts carries broader implications for local employment, businesses, and overall community sustainability. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not sufficiently demonstrate compliance with the National Planning Framework 4, particularly regarding economic impact and the requisite to establish a net benefit. It stands in opposition to strategic objectives that deem tourism a priority growth sector, lacking the necessary evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the combined failures to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency culminate in a significant evidential shortfall. This deficiency hinders a comprehensive evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not offer a comprehensive or reliable evidential basis for assessment.

There are significant deficiencies in the baseline data, the use of an undefined design envelope, and reliance on unspecified mitigation measures. Additionally, it omits crucial impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. These failures hinder the competent authority from properly assessing impacts on community

wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct opposition to National Planning Framework 4, the proposal 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 it does not include tourism impact modelling. Furthermore, the cumulative effects of offshore and onshore components have not been sufficiently evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy conflicts and unresolved environmental risks, prohibits a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Additional Comments

At no time was I or people of the surrounding area contacted by any council member or official on the consultation of this windfarm

I for one would never have built a house 4 miles from the propoused location.

This wind mfarm is not only going to effect my well being and mental health, but close down our tourist establishment and drive down the price of my property.

This windfarm is far to close to housing and tourist establishments on the Westside, N4 is going to scar the landscape, cause light pollution, health problems and numerious other habit distruction.

Its an disgrace that local people were not consulted

There is wildlife thats habitats will be effected or destroyed, The constant flickering and noise will cause problems not only for human life but will cause problems for livestock and animals, The constant pile driving will have an adverse effect on eveyones health and well being..

The infrostructure and logistics of this windfarm are going to cause massive disruptions to most of the local residents, who do not want this industrial mess on there island.

The culture and wellbeing of the residents should not be ignored.

The flightpath of bird life will also be under threat, along with there habitat. Sea life will be disrupted,
Which in some cases might not recover. This whole structure and industral is destroying a complete way of life and culture, that will not recover for the next 40 years . This is a short time fix for a money making exercise. With no benifit to the local community or for the Western Isles. Complete and utter distruction for greed not for green. Turning an enviroment into an idustrial wind farm is not a green option its a greed option.

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: A0D6049B

Member of the public 1912

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and its associated documentation, which reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, characterised by an Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise fundamental issues regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. It is noted that critical environmental data is absent, with baseline information being both limited and inconsistent. Key components of the proposal remain unclear, and the employment of a flexible design framework inhibits a precise understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects are unsupported by adequate evidence.

There exist pronounced and substantial conflicts with policy. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory assessments required for consent and weaken the capacity of the competent authority to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is significantly inadequate, failing to offer a thorough or dependable understanding of the ecological receptors in the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity, yet the baseline data remains incomplete, and the

methodologies employed do not sufficiently capture the presence, behaviour, or habitat utilisation of various species. Consequently, the assessment lacks a robust evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, a species afforded protection under European law. The application does not sufficiently acknowledge or assess their active use of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural patterns raises concerns, as it means that the implications of construction-related disturbances, noise, and increased human activity have not been adequately evaluated. This lack of consideration undermines any claims regarding the absence of significant effects on the otter population.

In addition, deficiencies are present in the assessment of basking sharks, which relies on aerial surveys that introduce a considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially in light of established land-based observations that indicate frequent use of these waters. The failure to integrate or adequately consider this data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological flaws lead to conclusions of negligible or non-significant effects being derived from assumptions rather than solid evidence. The absence of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth in the Environmental Impact Assessment regime and the National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced by these deficiencies obstructs the ability to rule out adverse effects with reasonable scientific certainty, thus necessitating the application of the precautionary principle. Under these circumstances, the grant of consent cannot be justified legally.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These shortcomings prevent a thorough evaluation of the impacts on marine ecology and protected species and support the overall assertion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a narrow viewpoint, treating heritage as a collection of isolated and unchanging assets, failing to recognise their ongoing social, cultural, and spiritual significance within the community.

There are notable deficiencies in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites remain active places for burial and spiritual practices, yet the assessment categorises them merely as static features, neglecting their current use, significance, and the development's potential impact on their surroundings. This mischaracterisation 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, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These components are essential to the area's identity but are entirely missing from the assessment, marking a considerable oversight. Without these factors being accounted for, the true cultural impact of the development remains inadequately understood.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population, characterised by a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to uphold established principles regarding participation in decisions that affect cultural and environmental matters.

A significant procedural gap is evident in the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone hampers a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the preservation of historic assets and places. The failure to engage with both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear deviation from policy requirements.

Overall, the neglect of living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application fails to establish a sufficient foundation for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern, as it hampers a lawful evaluation of the project's social, economic, and health implications. Although the developer engaged local residents through focus groups, the failure to publish the complete report results in a significant evidential gap. This

omission obstructs the public and the competent authority from fully understanding the social risks highlighted by the developer's research.

Residents have reported experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are based on direct feedback and are not mere speculation. However, without access to the complete assessment, it becomes challenging to scrutinise the findings effectively and assess their relevance in the decision-making process.

Moreover, the proposal is viewed as a threat to community identity and cohesion, with evidence of "cultural loss" arising from the developer's findings. Yet, these adverse impacts have not been adequately considered within the main application, which further complicates the understanding of the potential social costs associated with the development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A thorough comprehension of the social, economic, and health impacts is vital for projects of this magnitude, particularly when they may disrupt community character and functioning. By withholding the full dataset, the application does not provide a comprehensive evidential foundation for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the evidence available suggests that adverse effects exist and have not been fully revealed. Therefore, it is impossible to establish compliance with this policy without the complete assessment.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a significant omission within the application and falls short of the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

effecting a permanent and irreversible alteration to the landscape.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

The reliance on undefined future measures raises significant concerns, particularly given the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate details on how these risks will be prevented, controlled, or monitored.

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

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

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the Environmental Impact Assessment requirements. It is essential to assess likely significant effects and associated mitigation before consent can be granted; failure to provide such information renders a lawful determination impossible. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life within the

application is insufficient, lacking a robust evaluation of both ecological and socio-economic impacts. It fails to demonstrate that existing uses and habitats can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without consequences. The application does not provide evidence that alternative fishing grounds are available or capable of supporting increased pressure. This is a critical oversight, as the risk of overfishing elsewhere could have wider economic repercussions for the local fishing fleet. Without a clear and evidence-based assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Additionally, the proposal introduces substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over large distances, including species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without adequate supporting evidence.

There is an inconsistency in the application regarding the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

Furthermore, 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 cannot be accurately determined.

From a policy standpoint, the application does not demonstrate compliance with 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, making it impossible to conclude that the proposal embodies sustainable development.

The lack 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 impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure within the project is significantly deficient and does not adequately address the full range of impacts stemming from what constitutes a singular integrated project. The intrinsic link between the offshore

turbines and the onshore works has not been recognised, leading to a disjointed evaluation that fails to reveal the true magnitude of the environmental and socio-economic ramifications.

The onshore components encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of associated access infrastructure through ecologically sensitive landscapes. These activities involve excavating areas characterised by deep peat, particularly within Barvas Moor, which represents an important carbon store and ecologically delicate habitat. The current application lacks a thorough assessment of these effects, thus obscuring a complete understanding of the project's overall environmental footprint.

The omission or postponement of assessments concerning onshore impacts obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated in conjunction, yet the segregated examination of offshore and onshore elements results in an incomplete comprehension of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application has not sufficiently evidenced that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been implemented, thereby creating a notable evidential gap with respect to biodiversity preservation.

Further concerns arise regarding carbon balance; the disturbance of peatland may release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy initiatives. The application fails to adequately confront this issue or to prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land presents possible conflicts with pre-existing land use and legal rights. The application does not substantiate that the requisite consents or processes have been initiated, casting doubt on the project's deliverability and legal execution.

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

Collectively, the fragmentation of project elements, the absence of a thorough assessment, and the lack of evidence concerning environmental and land use impacts render this portion of the application incomplete and unreliable, hindering a lawful determination.

TOURISM

The evaluation of tourism impacts presented in the application is notably inadequate, omitting critical insights into the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

This sector has experienced considerable growth, with tourism revenue increasing from £65 million in 2017 to over £81.5 million and sustaining more than 1,000 jobs, which represents up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such an oversight prevents the determination of whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment does not adequately address the significance of environmental quality for tourism, particularly regarding how unspoiled landscapes and dark skies enhance visitor experiences and foster emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding impacts on an acknowledged and growing component of the local economy.

In an island community with limited economic diversity, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unevaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefits. It also runs counter to strategic objectives that prioritise tourism as a growth sector, and insufficient evidence is presented for the competent authority to assess the economic consequences of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the economic dependencies of the island culminate in a significant evidential gap. This gap undermines a robust assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards for sustainable development as required by statutory

duties, national policy, and evidential standards. It revisits the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current application is presented under a policy framework that places a stronger emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for this application. There is incomplete baseline data, an undefined design envelope, unspecified reliance on mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. The Environmental Impact Assessment is therefore inadequate, lacking the information necessary for a comprehensive understanding of significant effects or residual impacts.

Additionally, there are clear procedural issues. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, masking their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and may be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively inadequate for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for the application or use the appropriate regulatory provisions to request the submission of the missing information.

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

Additional Comments

The proposal to construct a large-scale wind farm along the coast of the Western Isles represents a profound and irreversible threat to our environment, our community, and our future. While renewable energy development is essential, it must not come at the disproportionate expense of fragile ecosystems and communities that receive none of the benefits. In its current form, this project should not proceed.

The environmental assessment underpinning this proposal appears insufficient in scope and depth for a development of this scale in such a sensitive and largely untouched Atlantic environment. Baseline data is limited, cumulative impacts are inadequately addressed, and there is a clear lack of long-term ecological modelling. This raises serious concerns that the true environmental cost is being underestimated or overlooked entirely.

The waters surrounding the Western Isles support a rich and diverse marine ecosystem, including protected species of seabirds, marine mammals, and benthic habitats. Industrial-scale construction, turbine operation, and associated vessel traffic risk habitat disruption, collision mortality, noise pollution, and displacement effects. These impacts are not theoretical—they are well-documented in comparable developments—and could irreparably damage biodiversity that has taken centuries to establish.

This coastline is not merely a physical space; it is central to the identity, heritage, and cultural continuity of the local community. The imposition of a vast industrial development risks eroding the character of a landscape that has remained largely unchanged for generations. Such transformation cannot be mitigated with superficial measures—it represents a fundamental loss.

The project introduces significant social strain. It creates division within communities, places stress on local infrastructure, and fosters a sense of powerlessness among residents who bear the burden without sharing in decision-making or benefit. The framing of local people as passive hosts to externally driven industrialisation is deeply concerning.

There is growing concern about the potential health implications of large-scale wind developments, including noise, infrasound, visual disturbance, and stress-related impacts. While debate continues in the scientific community, the precautionary principle must apply—particularly where communities are expected to live in close proximity. It is unacceptable for residents to feel like experimental subjects in an environment they cannot escape.

The Western Isles are defined by their open horizons, wild seascapes, and natural beauty. The introduction of a sprawling wind farm would fundamentally alter these defining characteristics. The visual intrusion of turbines, associated lighting, and

infrastructure would industrialise a landscape valued precisely for its remoteness and unspoiled nature.

Construction brings significant risks: seabed disturbance, sediment plumes, fuel spills, increased marine traffic, and noise pollution. These risks are heightened in remote, weather-exposed Atlantic conditions where containment and response are more difficult. Even minor incidents could have outsized ecological consequences.

Local fisheries depend on healthy, functioning marine ecosystems. Disruption to spawning grounds, migration routes, and feeding areas threatens both marine life and the livelihoods tied to it. The long-term economic and ecological cost to fisheries has not been adequately accounted for.

Beyond the turbines themselves, the project requires extensive onshore infrastructure—substations, cable landfalls, access roads, and grid connections. These elements fragment habitats, alter land use, and introduce industrial footprints far beyond the immediate coastline. These “hidden” impacts are often underrepresented but are deeply felt locally.

Tourism in the Western Isles relies on the perception—and reality—of unspoiled natural beauty. Industrialising the coastline risks undermining this key economic sector. Visitors seeking wilderness and tranquility may choose alternative destinations, leading to long-term economic loss that outweighs any short-term gains.

Perhaps most critically, the energy generated will not serve the local community but will be exported to the mainland and beyond, primarily benefiting external commercial interests. This creates a stark imbalance: the environmental, social, and cultural costs are borne locally, while the economic benefits are extracted elsewhere.

Renewable energy must be pursued responsibly, equitably, and with genuine respect for the environments and communities it affects. This proposal fails that test. It asks too much of a place that has already preserved what much of the world has lost—and offers too little in return. For these reasons, this development should not proceed in its current form.

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: C9AC8268

Member of the public 1913

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. The application is submitted under the marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The wind farm is proposed to be located off the west side of the Isle of Lewis, which is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise regarding the application's compliance with statutory requirements, national policy, and sustainable development principles. It lacks an adequate evidential basis for a lawful determination. There are critical environmental data gaps, with baseline information being both limited and inconsistent. Additionally, key aspects of the proposal are not clearly defined. The flexible design framework used complicates the assessment of likely significant effects, and the proposed mitigation measures have not yet been specified, making it impossible to evaluate 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.

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

The scale of this proposal is unprecedented for the area. The large turbines are planned to be positioned close to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for a lawful determination. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or reliable evaluation of the potential

environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately represent the development that is ultimately realised, obstructing both public understanding and that of the competent authority regarding the true extent of environmental consequences.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be rectified at a later stage precludes a meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally inappropriate and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations be clearly established before a determination is made.

There exist notable evidential deficiencies as well, encompassing gaps in 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, particularly when conclusions regarding negligible or non-significant effects are offered without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This necessitates the precautionary principle's application, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the presence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the

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

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has considered placing turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis undermines any claim that the proposed siting represents the least damaging option.

The deficiencies are also evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual importance such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, with reliance instead on post-design mitigation measures.

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

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate assessment and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

In particular, there is a crucial oversight concerning otters, a species that is protected under European law. The application neglects to adequately recognise and assess their active utilisation of coastal zones for both foraging and movement. This failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts arising from construction disturbance, noise, and

increased human activity. Such oversights undermine any conclusions drawn regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a flawed ornithological assessment characterised by significant gaps in evidence and internal contradictions that undermine its conclusions. Located within key foraging areas and migratory pathways, the development's impact on the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, is inadequately demonstrated. There is no robust evaluation of the potential implications of displacement, collision risk, or habitat loss associated with this project.

A troubling contradiction arises as the developer claims no significant adverse effects while simultaneously advancing 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 unsupported by the available evidence.

Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to

protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these critical feeding grounds is not fully considered, and the reliance on modelling approaches introduces additional uncertainty, especially for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality, particularly where baseline data is incomplete and behavioural responses are poorly understood.

The proposed siting of turbines within a recognised migratory corridor introduces further risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term implications of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not 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 data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and renders a lawful conclusion in support of consent impossible.

The identified deficiencies also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy.

Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and culminate in the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, static entities instead of acknowledging their continuous social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the handling of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment categorises them as static features, neglecting their ongoing significance and the repercussions of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment neglects to evaluate intangible cultural heritage, such as the Gaelic language, traditions, and the enduring connection between the community and

its coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, representing a major gap. Without addressing these elements, the potential cultural impact of the proposed development cannot be fully comprehended.

There are also pressing issues surrounding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, but there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to align with established principles of participation concerning decisions that affect cultural and environmental interests.

A crucial procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This oversight alone hinders a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially regarding the protection of historical assets and places. The inability to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear deviation from policy obligations.

When taken as a whole, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential void. The cultural impacts of the proposed development remain unassessed, and the application fails to offer a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is severely lacking, leading to significant concerns about the adequacy of the evaluation. Although the developer engaged in a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence restricts both public insight and the competent authority's understanding of the social risks highlighted in the developer’s own research.

Local residents are already feeling measurable stress, anxiety, and worry due to the scale and proximity of the proposed development. These effects are based on direct engagement with the community and are not speculative. However, the absence of the complete assessment hampers thorough scrutiny of the findings and limits the ability to evaluate their importance in the decision-making process.

Moreover, there is a perception among community members that the proposal threatens their identity and cohesion, with indications of "cultural loss" appearing in the developer’s findings. Unfortunately, these impacts have not been adequately

considered in the main application, nor have they been given the weight they deserve. The decision to withhold the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application fails to provide a solid evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence currently suggests pre-existing adverse effects that have not been adequately disclosed. Therefore, without the full assessment, it is impossible to confirm compliance with this policy.

The implications for procedure are significant, as the competent authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines would be situated in close proximity to the shoreline, introducing a continuous industrial presence that would fundamentally alter this character. This change would result in a permanent and irreversible transformation of the landscape.

The application fails to properly assess the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the natural and remote qualities of the area. The assessment does not adequately convey the significance of these impacts on such a sensitive landscape.

There are also concerns regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This may lead to an understatement of the visual impact, calling into question the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these assets as isolated, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of their cultural significance and setting.

The proposed industrialisation of the seascape would sever these vital connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This would not only create a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change proposed is incompatible with safeguarding the 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.

Additionally, the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is fundamental and permanent, and cannot be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

Furthermore, there is considerable uncertainty surrounding the magnitude and

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

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

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

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of marine life and fisheries. 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 how these vital habitats and uses can be safeguarded from disruption.

A major flaw in the application is the assumption that fishing activities can be shifted without negative consequences. There is no evidence presented that alternative fishing grounds exist or that they can support the pressure from displaced activities. This is a crucial gap, as such displacement may lead to overfishing in other areas, potentially impacting the local fishing fleet's economic viability. Without a thorough assessment based on evidence, understanding the implications for fisheries and local livelihoods remains incomplete.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise from construction activities. The use of high-energy hammer piling for an extended period is likely to disturb marine life over considerable distances, which could affect species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application appears to minimise these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application. While it acknowledges the need for licenses to allow harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction questions the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially in cases where harm necessitates legal approval.

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

In terms of policy compliance, the application does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the presence of internal inconsistencies render the assessment incomplete and unreliable. These issues hinder any robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is critically deficient and does not encompass the complete range of impacts stemming from a singular integrated project. The onshore works, including cabling across protected moorland and the construction of a substation near Stornoway, are fundamentally linked to the offshore turbines. However, they are evaluated separately, which leads to a fragmented analysis that obscures the overall environmental and socio-economic consequences.

The onshore activities necessitate excavation in regions of deep peat, particularly within Barvas Moor, an area recognised as a significant carbon store and ecologically fragile habitat. The application lacks a thorough assessment of these impacts, inhibiting a full understanding of the project's comprehensive environmental footprint. By omitting or delaying the evaluation of onshore effects, the application restricts a proper appraisal of cumulative consequences. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the disjointed assessment of offshore and onshore components means that the combined repercussions on peatlands, habitats, and local communities remain inadequately addressed.

Furthermore, there are substantial risks to sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, highlighting a significant evidential gap in terms of biodiversity protection. Additionally, the disturbance of peatland raises

concerns about carbon balance, as releasing stored carbon could result in a carbon debt that contradicts renewable energy development goals. This issue is not sufficiently addressed in the application, nor is there evidence to affirm that the overall carbon balance is favourable.

The routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide proof that the necessary consents or procedures have been initiated, casting doubt on the project's deliverability and lawful execution. From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests contravenes both the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly undermines the application.

In conclusion, the separation of project components, coupled with the absence of a comprehensive assessment and the lack of evidence regarding environmental and land use impacts, renders this segment of the application incomplete and untrustworthy, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism value. The proposed development introduces permanent red aviation lighting that would create a persistent and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. This significant change is not addressed within the Environmental Impact Assessment, which fails to evaluate the impact of such lighting on visual amenity, landscape character, and the experience of residents and visitors. The absence of this analysis is particularly concerning given the rising importance of dark skies for the area’s identity and the growth of astro-tourism.

Moreover, there is a lack of assessment regarding the potential effects of the lighting on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be sensitive to artificial lighting due to their phototactic responses, leading to disorientation and increased risks of collision. The application notably does not include any evaluation of lighting impacts or a phototaxis study, which are essential for understanding how aviation lighting might influence these species and contribute to increased mortality rates.

This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks that come with artificial light. For instance, Kittiwakes may forage or migrate at night and are susceptible to disorientation from such lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant void in comprehending the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain

whether protected species or designated sites might be adversely affected. The evidential standard necessary 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 contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the overall ecological context.

In summary, the complete lack of assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analyses renders the application incomplete, making it incapable of supporting a 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 Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the critical concerns that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not adequately address these priorities.

There are significant gaps in the evidential basis for the proposal, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the application lacks clarity regarding mitigation measures and does not address crucial impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident. The proposal lacks a compliant Island Communities Impact Assessment, violating statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Moreover, the proposal contradicts National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the net economic benefit of the project. Furthermore, the cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The evidential standard required to confidently rule out adverse effects has not been achieved, necessitating

the application of the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

This development is over industrialisation of a sensitive and fragile environment.
It is taking advantage of a smaller population and a culture and heritage that will be irreparably ruined.
The scale is monstrous and the impact severe.
The waters off the west coast of Lewis are rich and clean, and that ecosystem should be preserved.
The welfare of the population is at stake here, and not to be underestimated. It is irresponsible to proceed.
I strongly object to the Spiorad na Mara Wind Farm proposal. It most certainly is not in the "Spiorad" of "na Mara" - quite the contrary.

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: F3BD7181

Member of the public 1914

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact.

The application does not provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The use of a flexible design framework prevents a clear understanding of likely significant effects, while the reliance on mitigation measures that have not yet been specified means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to conclude that the development is acceptable in policy terms.

Given the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply. The development is located off the west side of the Isle of Lewis, an area defined by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application for consent fails to fulfil the evidential threshold mandated by the Habitats Regulations, thus failing to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not

demonstrate adherence to National Planning Framework 4, including stipulations related to the protection of biodiversity and environmental integrity. It cannot be established that the impacts have been comprehensively assessed or that appropriate safeguards are in place.

The Environmental Impact Assessment Report suffers from material deficiencies and does not provide a full, transparent, or reliable account of the likely environmental effects of the proposal. The flexible Project Design Envelope employed lacks commitment to specific turbine dimensions, layouts, or configurations, which creates significant uncertainty and obstructs a consistent application of a worst-case scenario. This weakness undermines the integrity of the assessment, meaning that the impacts presented may not accurately reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are prevented from understanding the true extent of the environmental effects.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have not yet been defined. Thus, consent is sought on the premise that environmental harm will be addressed subsequently, obstructing any meaningful evaluation of the effectiveness of such measures or assessment of residual impacts. This deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are clearly established prior to determination.

The report further exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings result in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is severely lacking and does not adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental effects, the application presents a narrative of project development. This method fails to show that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging alternatives.

There is a distinct absence of transparent or evidence-based comparisons regarding alternative offshore sites, development sizes, or design options. Notably, the application does not show that the developer has genuinely explored the possibility of positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impact, the lack of such an analysis means that it cannot be concluded that the proposed siting is the least damaging choice available.

These shortcomings extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been properly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been applied, relying instead on mitigation measures that come after the design phase.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through choices regarding site selection, layout, and infrastructure routing. This signifies 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 cannot be asserted that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, particularly in the context of safeguarding natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that adds to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development's assessment of marine ecology and protected species is significantly flawed, leading to an unreliable understanding of ecological receptors within the West Lewis coastal environment. This area is recognised as a biologically active and sensitive marine system. However, the baseline data provided is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable gap in the assessment concerns otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible effects of construction disturbance, noise, and increased activity have not been sufficiently

evaluated. Such shortcomings undermine any claims about the absence of significant effects on otters.

Additionally, the assessment of basking sharks presents further deficiencies. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions, which likely leads to an underestimation of their presence. This is particularly evident when comparing the aerial survey results with established land-based observations that indicate frequent use of these waters. The failure to include or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological limitations present throughout the assessment mean that assertions of negligible or non-significant effects are based on assumptions rather than on robust evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of 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 deficiencies hinder a thorough evaluation of the impacts on marine ecology and protected species and contribute to the conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant deficiencies, rendering it unreliable. It fails to demonstrate adequately, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. Many of these species are already in decline, and the development is situated within crucial foraging areas and migratory pathways. The implications of displacement, collision risk, and habitat loss are not rigorously evaluated, which undermines the overall conclusions of the assessment.

A key inconsistency within the application arises from the developer's conclusion of no significant adverse effects, which contradicts the advancement of a Habitats Regulations derogation case, typically necessitated only in instances where significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn lack adequate supporting evidence. The assessment does not convincingly demonstrate that seabirds associated

with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds has not been fully considered, and reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, including Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within an established migratory corridor poses an additional, significant risk, as it creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term effects 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 ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, in conjunction 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, which impedes a lawful conclusion in favour of consent. Furthermore, the identified deficiencies illustrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to substantiate that internationally significant seabird populations will remain unaffected directly conflicts with national policy.

In summary, the shortcomings identified render the assessment unreliable, due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A major shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practices, but the assessment categorises them as static features. This approach neglects their ongoing use and meaning, as well as the potential impacts of development on their surroundings. As a result, the evaluation of cultural effects is incomplete and does not reflect their importance in community life.

Moreover, the application overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the

community and the coastal environment. These aspects are crucial to the area's identity, yet they are absent from the assessment, representing a significant oversight. Without addressing these factors, the true cultural impact of the development remains unclear.

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

A significant procedural error is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 presented regarding the seascape, landscape, and visual impacts is fundamentally inadequate, failing to accurately capture the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposal to introduce large-scale turbines near the shore would lead to a continuous and overwhelming industrial presence, significantly altering this distinctive character and resulting in an irreversible transformation of the landscape.

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

Concerns arise regarding the methodology used in selecting and presenting visual

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

Moreover, there is a notable deficiency in assessing the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets in isolation instead of recognising their interdependence, resulting in a failure to thoroughly evaluate the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are appreciated and disrupting their ties to the natural horizon. This represents a visual impact along with broader cultural and spatial harm that the application has not adequately evaluated.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the environmental assessment related to construction and pollution risks. It lacks the necessary detail to effectively evaluate potential environmental impacts, particularly given that the West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. This sensitive environment necessitates well-defined Construction Environmental Management Plans and Pollution Prevention Plans, which are currently absent. Instead, the application relies on vague mitigation and contingency measures that are to be developed after consent is granted, obstructing any meaningful assessment of their potential effectiveness.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from the proposed seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it is impossible to ascertain the extent and duration of these impacts, or their ecological ramifications. This uncertainty extends to sensitive marine species and habitats that have already been identified in broader assessments.

Additionally, the absence of detailed emergency response procedures compounds these issues. The deferral of essential contingency planning until after consent is granted hinders a proper evaluation of whether adequate safeguards are in place to address potential pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and potential mitigation are assessed prior to consent; if this crucial information is absent, a lawful determination cannot be achieved. The application also fails to demonstrate adherence to policy requirements regarding environmental protection and water quality.

Ultimately, the deficiencies in defined mitigation measures, the lack of comprehensive management plans, and the uncertainty surrounding potential impacts render the assessment materially insufficient. These flaws prevent a thorough evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment fails to provide a strong evaluation of the ecological or socio-economic impacts on 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 prove that these uses and habitats can be protected or maintained without serious disruption.

A significant concern is the assumption that fishing activities can be moved without any consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or able to handle additional pressure. This lack of information is crucial, as displacement could lead to overfishing in other areas and might have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to understand the impacts on fisheries and local livelihoods.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise produced during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over large areas, affecting

species such as dolphins. The predicted disturbance to a significant part of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Moreover, there is an inconsistency in the application regarding the necessity for licences to allow harm to European Protected Species, while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises issues concerning compliance with the Habitats Regulations, especially where harm is expected to a level that requires legal approval.

The assessment does not account for cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough examination 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 show compliance with National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a significant challenge due to its fragmented assessment of onshore infrastructure, which is insufficient and does not account for the entirety of impacts associated with the integrated project. The offshore turbines and onshore works are interdependent, yet they are evaluated in isolation, leading to an incomplete understanding of the environmental and socio-economic consequences of the project.

Key onshore elements of the proposal encompass cabling that crosses protected moorland, the construction of a substation close to Stornoway, and the creation of access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, an important carbon store and ecologically significant habitat. The lack of a thorough assessment regarding these impacts results in an inadequate comprehension of the project’s overall environmental footprint.

This omission of onshore impact assessments prevents a proper evaluation of cumulative effects, as the Environmental Impact Assessment process mandates that all project components be considered collectively. The disjointed analysis of offshore and onshore elements obscures the understanding of combined impacts on peatlands, habitats, and local communities.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to establish that impacts on these critical habitats have been thoroughly evaluated or that adequate avoidance measures have been incorporated. This situation leads to a significant evidential gap concerning biodiversity protection.

Concerns also arise around the project's carbon balance. The disruption of peatland can release sequestered carbon, which might create a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or confirm that the overall carbon balance remains advantageous.

Moreover, the planned routing of infrastructure through active croft land brings potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions regarding the feasibility and lawful execution of the project.

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 is inconsistent with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts culminate in an incomplete and unreliable application, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is noted for its exceptionally dark skies, which are essential to the region's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, which would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly notable given the significance of dark skies to the area's identity and the growth of tourism sectors, such as astro-tourism. The neglect of these impacts represents a shortfall in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and heightened

collision risks. The application does not include any lighting impact assessment or phototaxis study, thereby failing to assess the potential effects of aviation lighting on these species and the risk of increased mortality.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation due to artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it remains 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 is not satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts 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 the night-time environment is a crucial aspect of the overall setting.

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife signifies a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate a lawful determination.

TOURISM

The Isle of Lewis relies heavily on tourism, with the sector growing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the local economy. However, the application fails to assess the significant economic and social impacts that the proposed development could have on this key sector. It is acknowledged that 86% of visitors are attracted by the area's scenery, yet there is no quantitative analysis provided to understand how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment does not take into account the crucial role that environmental quality plays in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experiences is essential, particularly for growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding the impacts on this recognised and expanding part of the local economy.

In a community with limited economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and the

sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, as mandated by the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency leads to a significant evidential gap. This deficiency prevents a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding sustainable development and does not meet the necessary statutory duties. It mirrors the issues that caused the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being submitted under a more stringent policy framework that emphasises biodiversity and community wellbeing, it fails to provide a comprehensive evidential basis for assessment.

Critical gaps in baseline data and reliance on an undefined design envelope undermine the application. There are also unspecified mitigation measures and significant omissions, such as impacts on nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment remains incomplete, hindering a thorough understanding of significant effects and residual impacts.

Additionally, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment is a substantial omission. These issues prevent the competent authority from effectively evaluating impacts on community wellbeing and cultural identity, making the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to safeguard biodiversity, natural places, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, complicating assessments related to peatlands, carbon balance, and crofting land.

The environmental risks associated with this proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and

marine mammals are incomplete and occasionally inconsistent. The application does not meet the evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt, thereby activating 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 industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption of cultural and visual relationships are permanent effects that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is essential for the competent authority to refuse consent for the Spiorad na Mara Offshore Wind Farm application or require the submission of the missing information.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 096603D0